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For more information about our minerals and waste planning policy go to:

Cover photograph acknowledgements:

1. Gt Blakenham Energy from Waste Facility, courtesy of SUEZ Recycling and Recovery UK Ltd, and;

2. Cavenham Quarry, with permission from Allen Newport Ltd.
CONTENTS
1. Format .................................................................................................................................. 3
2. Executive Summary ............................................................................................................... 4
3. Introduction .......................................................................................................................... 5
4. Vision, aims and objectives .................................................................................................. 6
5. General Policies .................................................................................................................... 17
6. Minerals Policies ................................................................................................................... 29
7. Waste policies ......................................................................................................................... 55
9. Barham .................................................................................................................................. 73
10. Barnham ............................................................................................................................... 77
11. Belstead ............................................................................................................................... 114
12. Cavenham ........................................................................................................................... 122
13. Layham ................................................................................................................................ 158
14. Tattingstone ......................................................................................................................... 171
15. Wangford ............................................................................................................................. 178
16. Wetherden ............................................................................................................................ 234
17. Wherstead ............................................................................................................................ 249
18. Worlington ............................................................................................................................ 252
19. Sizewell A nuclear power station ......................................................................................... 256
20. Appendices ........................................................................................................................... 258
21. Proposals map ....................................................................................................................... 260
22. Sustainability appraisal ......................................................................................................... 261
23. Habitats Regulations Assessment ....................................................................................... 269
24. Evidence base ....................................................................................................................... 273
25. Other .................................................................................................................................... 274
26. Representations received after the deadline ......................................................................... 295
27. Consultation statistics ........................................................................................................... 301
1. **Format**

1.1 This document sets out the representations received in response to the public consultation held between the 5pm on the 11 June 2018 and 5pm on the 23 July 2018, upon the Suffolk Minerals and Waste Local Plan, Submission Draft document. Also included are the County Council’s responses to those representations.

1.2 A total of 309 comments were made. A table showing the distribution of these comments in respect of subject matter is included at the end of this document in the “Consultation statistics” section.

1.3 Words highlighted in **bold text** within the “SCC Response” column indicate where changes are proposed by Suffolk County Council. A second table showing all the proposed changes is included at the end of this document in the “Consultation statistics” section.

1.5 Please note that all the representations received are available online at: https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/public-examination/ Some may contain additional maps, photos, diagrams and tables which have not be included in this document.
## 2. **EXECUTIVE SUMMARY**

<table>
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<tr>
<th>Reference Number</th>
<th>Respondent</th>
<th>Legally compliant?</th>
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<th>Compliance with duty to co-operate?</th>
<th>Representation</th>
<th>SCC Response</th>
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<tbody>
<tr>
<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td></td>
<td></td>
<td></td>
<td>There is a typographical error raised in our previous consultation which has not been amended: 'completing' rather than 'competing'</td>
<td>Agree, typographical error will be corrected.</td>
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3. **INTRODUCTION**

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<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
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<td></td>
<td></td>
<td>We note the typographical error in our previous response has been amended</td>
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### 4. **VISION, AIMS AND OBJECTIVES**

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<th>Reference Number</th>
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<th>Representation</th>
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<tr>
<td>90559825</td>
<td>Beverley McClean (received via email), AONB Planning Officer, AONB Team</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Thank you for the opportunity to comment on the Submission SMWLP. This response is on behalf of the AONB Partnerships of the Suffolk Coast &amp; Heaths and Dedham Vale AONBs. The Partnerships were formed in 1993. They comprise public, private and voluntary organisations who are committed to conserving and enhancing the Natural Beauty of the AONBs. The Partnership's role is to oversee delivery of the AONB Management Plans. It meets at least twice a year to discuss significant issues in the AONB, and delivery of the Plan. Each AONB Partnership is made up of local authorities and representatives of the environmental, farming, landowning, business organisations. Details of membership can be found on the AONBs websites: from the following organisations: <a href="http://www.suffolkcoastandheaths.org/projects-and-partnerships/the-aonb-partnership/">http://www.suffolkcoastandheaths.org/projects-and-partnerships/the-aonb-partnership/</a> <a href="http://www.dedhamvalestourvalley.org/about-us/jac-and-partnership/">http://www.dedhamvalestourvalley.org/about-us/jac-and-partnership/</a> For the avoidance of any doubt please note: Many of these partners are public bodies or statutory undertakers which have the duties to conserve and enhance the Natural Beauty of the AONB as set out in section 85 of the Countryside and Rights of Way Act (2000). They are likely to make individual representations to SMWLP consultation that reflects their individual interests and responsibilities. Furthermore, whilst AONB Partnerships are not a statutory consultee, those partners with the statutory responsibility for the AONB will make a response as appropriate. This is a response from the AONB Partnerships. In that regard, the response has sought to address issues in a level of detail that all Partners can support. However, given SCC considers that specific mention of the AONB and Broads in the vision, aims and objectives is not necessary. They are intended to reflect the matters that are to be taken into account as set out in the NPPF and the NPPW and are intended to be broad brush in their approach so that additional detail added to emphasize particular aspects to be considered would unbalance the overall Vision, Aims and Objectives. <strong>As a compromise reference to “landscape character” could be added to the Vision and Objective 5.</strong> Reference to landscape character is already referred to under Objective 7.</td>
</tr>
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that the membership of the Partnerships includes members of local authorities and statutory agencies, many partners may make their own responses, as bodies that have statutory duties to the AONB. Many partners are custodians of Natural Beauty indicators and the special qualities of the AONBs, therefore the AONB Partnerships’ response should be considered complementary to those responses, rather than the only response addressing AONB issues.

The AONB Partnerships Response:

Summary

The AONB Partnerships object to the inclusion of the site at Wangford for mineral extraction because:

• The SMWLP is not considered compliant with the National policy context with regards conserving and enhancing AONBs, European sites and heritage assets.

• The exceptional, national need case required to contemplate justification for over-riding the National policy has not been made

• Insufficient assessments have been undertaken to relation to the likely impacts of the proposal on the Protected Landscape or Protected Sites within proximity such that it is not possible at this stage to rule out likely adverse impacts

• The Habitats Regulations Assessment completed does not satisfy the requirements of the Conservation of Habitats and Species Regulations 2017

National Policy and Guidance

Areas of Outstanding Natural Beauty (AONBs) are designated by the Government to ensure that the special qualities of the finest landscapes in England, Wales and Northern Ireland are conserved and enhanced.

The primary purpose of AONB designation is to conserve and enhance the natural beauty of the area, as confirmed by Section 82 of the Countryside and Rights of Way Act 2000 (CRoW Act).

The Government has confirmed that the landscape qualities of AONBs and National Parks have equal status in terms of protection, and the protection given by the land use planning system to natural beauty in both types of area should also be equal.

The AONB designation is also of international importance, recognised as a Category V Protected Landscape by the International Union for the Conservation of Nature (IUCN) and AONBs are defined within the Environmental Impact
Assessments Regulations for specific consideration as a “sensitive area”.
Within Section 85 (1) of the CRoW Act 2000 there is a duty on all relevant authorities to have regard to this purpose in exercising or performing any functions in relation to, or so as to affect land in AONBs. This Duty of Regard requires all public bodies, down to parish council level, to consider the AONBs nationally protected status in any land use related decisions. This includes planning applications and the formulation of Local and Neighbourhood Plans.
Guidance on the implication of this duty and how it may be discharged was issued by Defra in 2005. This includes the statement “Additionally, it may sometimes be the case that the activities of certain authorities operating outside the boundaries of these areas may have an impact within them. In such cases, relevant authorities will also be expected to have regard to the purposes of these areas”. The Guidance includes a list of relevant authorities, although this is not definitive.

Sections 88 and 89 of the Act state that each Local Authority or Conservation Board shall prepare and publish a Management Plan for their AONB which should then be reviewed at intervals of no more than 5 years. Management Plans are adopted statutory policy of the Local Authority AONB and have been recognised as a ‘material consideration’ in the planning decision making process. Suffolk County Council are a signatory to both the Dedham Vale and Suffolk Coast & Heaths AONB Management Plans.

The Suffolk Coast & Heaths AONB Management Plan (2013-18)
Attention is drawn to the following AONB Management Plan Objectives:
• Objective 2.7 There is a consistently high standard of development control decision-making. This will prevent adverse impact on the landscape and natural beauty of the AONB, as set out in the NPPF.
• Objective 2.8 The special qualities of the AONB are consistently taken into account and enhanced by the planning process.

AONBs feature high up in the hierarchy of protection, seeking to prevent inappropriate exploitation (e.g. minerals, development etc) while maintaining high quality renewable
resources (e.g. water resource protection or food production).

Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty (AONBs) and the Norfolk and Suffolk Broads. (Defra, 2005)

The Dedham Vale AONB and Stour Valley Management Plan (2016-2021)

Attention is drawn to the following Management Plan policies:
• Lobby for national and local planning policies to reflect the significant of the natural beauty and special qualities of the AONB and Stour Valley.
• Support development that contributes to appropriate economic development and contributes to the conservation and enhancement of the AONB and Stour Valley.
• Protect the area, including its setting from developments that detract from its natural beauty and special qualities, including relative tranquillity.
• Maintain the local distinctiveness of the Dedham Vale and Stour Valley.
• Ensure Local Plans reflect the need to conserve and enhance the AONB and Stour Valley.
• Support development that contributes to the conservation and enhancement of local character AONB Partnerships response Submission SMWLP

The National Planning Policy Framework (NPPF) identifies the three dimensions of sustainable development, as being economic, social and environmental.

Paragraph 14 of the NPPF promotes “a presumption in favour of sustainable development” but then highlights the position for plan makers and for decision makers areas where this policy may be restricted. Footnote 9 in the NPPF specifically identifies AONBs as such areas where restrictions may apply to the above presumption. The SMWLP fails to address Footnote 9 in its interpretation of para. 14.

Paragraph 109 requires the planning system to contribute to and enhance the natural and local environment by: recognising the wider benefits of ecosystem services and minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological
networks that are more resilient to current and future pressures;
Paragraph 113 of the NPPF states that local planning authorities should set criteria-based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Clarity on the County Council’s position in relation to the allocation of Minerals and Waste sites within the AONBs or their setting would be improved with the inclusion of a specific policy relating to the matter.
Paragraph 115 of the National Planning Policy Framework (NPPF) provides specific planning guidance for plan makers and decision takers in relation to AONBs and confirms that great weight should be given to conserving landscape and scenic beauty in National Parks and AONBs, which have the highest status of protection in relation to landscape and scenic beauty, Para. 115 NPPF states that: Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty”.
Paragraph 116 of the NPPF states that “Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated that they are in the public interest. Consideration of such applications should include an assessment of:
• The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
• The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
• Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that can be moderated.”
Paragraph 129 requires local planning authorities to identify and assess the significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available AONB Partnerships response Submission SMWLP Page 5 evidence and any necessary expertise.
They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

Paragraph 143 (bullet point 7 states that local plans should set out environmental criteria, in line with the policies in this Framework, against which planning applications will be assessed so as to ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health, including from noise, dust, visual intrusion, traffic, tip- and quarry-slope stability, differential settlement of quarry backfill, mining subsidence, increased flood risk, impacts on the flow and quantity of surface and groundwater and migration of contamination from the site; and take into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality.

Paragraph 144 NPPF (bullet points 2 & 3) states:

As far as practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, Areas of Outstanding Natural Beauty and World Heritage sites, Scheduled Ancient Monuments and Conservation Areas.

Ensure in granting planning permission for mineral extraction, that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple sites and/or from a number of sites in a locality.

**SMWLP Vision**

The Vision in the Submission SMWLP as drafted does not recognise the potential for mineral and waste allocations to result in significant adverse impacts upon the Suffolk Coast & Heaths and the Dedham Vale Areas of Outstanding Natural Beauty (AONBs) or their setting, the Norfolk Broads or landscape character.

The 2nd paragraph of the vision should be amended to ensure that these issues are properly recognised and to ensure that the plan is compliant with paragraph 115 of the NPPF.

**Requested change:** Minerals and waste management sites will only be permitted in appropriate locations and will be required to be operated to high standards, so that they do not cause a significantly adverse impact upon the...
environment, the Suffolk Coast & Heaths and Dedham Vale Areas of Outstanding Natural Beauty (AONBs), or their settings, the Norfolk Broads, landscape character, the historic environment, local amenity or endanger human health.

SMWLP Aims and Objectives

12.0 The Partnerships consider that the following modifications are needed to objectives 3, 5 & 7 to ensure that all the nationally designated landscapes within the SMWLP area i.e. the Dedham Vale AONB, the Suffolk Coast & Heaths AONB or their settings and the Broads National Park, are recognised and properly considered as part of the SWMLP process.

AONB Partnerships response Submission SMWLP Page 6

Aim 1 Objective 3: “identifying environmentally acceptable sources of sand & gravel and sites for waste management on the Proposals Map”.

A Sustainability Appraisal, a high-level Habitats Regulations Scoping Assessment and an Outline Landscape and Visual Impact Assessment (LVIA) for the Wangford site (MS7), have been submitted as part of the evidence base. We have several concerns about the completeness of the assessments submitted to support the allocation of sites within the AONBs or within their settings. We question whether the HRA and Outline LVIA are sufficiently robust to have enabled the most environmentally acceptable sources of sand and gravel to have been proposed for allocation in the submission document. The HRA and LVIA are discussed in more detail later in this response.

Aim 2: Objective 5 To minimise and mitigate the impact of minerals and waste development on the environment.

In response to the Preferred Options consultation on the SMWLP, we requested the inclusion of a reference to landscape character, natural beauty and special qualities in the environmental protection policies. Objective 5 has not been modified to include these changes.

The Partnerships consider that the following modifications are proposed to objective 5 & 7.

Objective 5: including environmental protection policies for the consideration of minerals proposals that make reference to the impact upon nature conservation, the historic environment, the Dedham Vale and Suffolk Coast & Heaths AONBs, including their settings, the Broads
<table>
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<th>Reference</th>
<th>Name</th>
<th>Position</th>
<th>Yes/No</th>
<th>Comments</th>
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<tr>
<td>90540628</td>
<td>Mrs Sarah Barker, Senior Planning Officer, Ipswich Borough Council</td>
<td>Yes/No/Yes</td>
<td>Wharf protection – Aim 3 and Objective 8 on page 9 then Para 4.10 and Para 5.22</td>
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<tr>
<td>90767232</td>
<td>Dr Natalie Gates,</td>
<td></td>
<td>We welcome the inclusion of the historic environment in response to our previous comments</td>
<td>Noted.</td>
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<td>Entry</td>
<td>Name and Role</td>
<td>Text</td>
<td>Notes</td>
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<tr>
<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td>We reiterate our previous comment that this aim should read: “to avoid, minimise and mitigate the impact of minerals and waste development on the environment by:” as the aim should be to avoid harm in the first place before minimising or mitigating (Planning Practice Guidance, paragraph 019 reference ID 18a-20140306 revision date 06 03 2014)</td>
<td>SCC would accept such an amendment to Aim 2.</td>
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<tr>
<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td>Following on from our previous comments, we would welcome consistency with objective 7 for example, ‘visual impacts’ instead of ‘visual intrusion’ and the addition of landscape character.</td>
<td>SCC would accept modification to change text to “visual impact” to ensure consistency with other objectives, as the intention of the objective would remain the same.</td>
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<tr>
<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td>We welcome the addition of cumulative impacts to objective 7 in our response to previous comments</td>
<td>Noted.</td>
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<tr>
<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td>Para 4.6: We welcome the example in response to our previous comments.</td>
<td>Noted.</td>
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<tr>
<td>90772535</td>
<td>Mr Mike Jones (received via email), Conservation Officer, RSPB</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
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appropriate means for delivery of these requirements. We therefore strongly recommend that the plan Vision should reflect the requirements of the NPPF for the plan to provide positive direction to strategic landscape-scale restoration to biodiversity and green infrastructure.

The site allocations element of the plan should include the following information for each mineral site:

- The proposed restoration and after-use, prioritising biodiversity-led restoration (as required by draft minerals policy MP7) and the establishment of coherent and resilient ecological networks (the draft Nottinghamshire Minerals Local Plan provides a good example of this biodiversity-led approach1);

- How the restoration will contribute to delivering: (i) the landscape-scale conservation objectives for the area (as per draft policy MP7); (ii) a net-gain in biodiversity; (iii) local biodiversity targets; and (iv) a coherent and resilient ecological network (the Somerset Minerals Local Plan’s Restoration Topic Paper 1 provides a good example of identifying how clusters of mineral sites can contribute to the ecological network of the area.);

- the priority habitats that would be the most appropriate (but emphasising that restoration should avoid habitat packing, where small areas of lots of habitats are packed into the site) (the draft Nottinghamshire Minerals Local Plan provides a good example of this approach);

- a target for the minimum area (and type) of priority habitat that will be created (i.e. at least x hectares of y habitat) (the Essex Minerals Local Plan provides a good example of this approach, as outlined in its topic paper on ‘The Implementation of Biodiversity and Habitat Creation Targets’1);

- how the proposed restoration will complement the restoration of other mineral sites in the vicinity (Cambridgeshire’s Block Fen/ Langwood Fen Supplementary Planning Document 1 provides a good example of this approach, with a ‘masterplan’ approach that covers a cluster of mineral sites).
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<td>• how the proposed restoration will complement existing priority habitat and nature conservation designations in the vicinity (Northamptonshire's assessment of habitat creation opportunities through the restoration of allocated minerals sites provides a good example of this approach1);</td>
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<td>• for sites on Best and Most Versatile (BMV) agricultural land, indicate how the long-term potential of the BMV soils will be preserved (whilst delivering biodiversity-led restoration) (the Surrey Minerals Local Plan provides a good example of this approach1);</td>
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<td>• for riparian sites, give consideration to the opportunity for floodplain reconnection and naturalising the river channel (the draft Nottinghamshire Local Plan provides a good example of this approach).</td>
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5. **GENERAL POLICIES**

**POLICY GP1 PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT**

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<tr>
<td>90559825</td>
<td>Beverley McClean (received via email), AONB Planning Officer, AONB Team</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>GP1 – Presumption in favour of Sustainable Development The NPPF identifies the three dimensions of sustainable development, as being economic, social and environmental. Paragraph 14 of the NPPF promotes &quot;a presumption in favour of sustainable development&quot; but then highlights the position for plan makers and for decision makers areas where this policy may be restricted. Footnote 9 in the NPPF specifically identifies AONBs as such areas where restrictions may apply to the above presumption. Paragraph 119 of the NPPF is clear however that the presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined. By proposing the allocation of the sites at Layham, Tattingstone and Wangford, which are located wholly within or within the setting of the Suffolk Coast &amp; Heaths and the Dedham Vale AONBs, the Submission SMWLP fails to address Footnote 9 in its interpretation of para. 14. We consider this to be a serious omission. We consider that the proposed allocations at Layham, Tattingstone and Wangford also conflict with the objectives of paragraph 143 and 144 of the NPPF. The proposed allocation of these sites has not been adequately justified and we do not consider that all potential significant adverse impacts have been adequately assessed to date. It is not clear how paragraph 115 of the NPPF which requires great weight to be given to conserving landscape and scenic beauty in National Parks and AONBs has been satisfied by proposing mineral sites in the AONB or within the setting of the AONBs in Suffolk and north Essex. Nor it is clear how the planning objectives in the Management Plans for the Suffolk Coast &amp; Heaths and Dedham Vale Policy GP1 notes that there are exceptions to the presumption in favour of sustainable development (as outlined in the NPPF footnote 9) in part &quot;b&quot; of the policy. It is accepted that development within an AONB is restricted by footnote 9, but it is not completely exempt from major development, provided the criteria of paragraph 116 are met, which SCC considers they have been. SCC aims to meet the requirements of paragraph 109 of the NPPF by including policy GP4, which addresses all of the issues raised in this paragraph. The explanatory text of the plan also details the specific environmental issues that may arise at each site and the plan encourages net biodiversity gain in policy MP6 and requires site aftercare in policy MP7. With regards to paragraph 115 of the NPPF, weight has been given to the conserving the landscape of the AONB during the site selection process, where sites such as Henham were specifically excluded due to their potential impacts to AONBs. Other sites not in the AONB were considered, but found to be unsuitable and the full details can be found in the Site Selection Reports. SCC also considered other sources of aggregate such as recycled aggregate and marine aggregate as part of Suffolk's aggregate supply. Supplies of aggregate from recycling are difficult to predict as they are tied to construction, demolition and excavation activities. While approximately 8 million tonnes of aggregate are licenced off the coast of East Anglia, relatively small tonnages are landed in Suffolk, with most of the material being landed in London, so this cannot be relied upon to supply Suffolk's needs, as the market determines where this...</td>
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<td>AONBs have been considered, nor the Duty of Regard met, as required by the CROW Act. This needs to be much more clearly justified and evidenced. Without greater justification and further detailed assessment we therefore consider the proposed allocation of the mineral sites at Layham, Tattingstone and Wangford to be premature and non-compliant with paragraphs 14 (footnote 9), 109, 115, 143 and 144 of the NPPF, the AONB Management Plans and Section 85 of the Crow Act. material is landed. For these reasons SCC needed to consider sources of aggregate within the AONB. SCC accepts that there is a Duty of Regard placed on it by the CROW Act., however the explanatory notes to the CROW Act. states that &quot;The requirement to have regard to conserving and enhancing natural beauty will not override particular considerations which have to be taken into account by relevant authorities in carrying out any function.&quot; This includes it's function as the minerals planning authority.</td>
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<tr>
<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td>Para 4.6: We welcome the example in response to our previous comments</td>
<td>Noted.</td>
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<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td>While a) references the tests in the National Planning Policy Framework, in terms of the historic environment the presumption is that great weight should be given to heritage asset's conservation. Any proposal for harm or loss requires justification. In cases of substantial harm or loss it has to be necessary to achieve substantial public benefits which outweigh the harm or loss. the test in a) subverts the test in paragraph 133 of the Framework by having to justify how the harm or loss outweighs the benefits. In order to make the plan sound, please amend the policy to more accurately reflect the test in the NPPF.</td>
<td>Clause b) covers this point.</td>
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<tr>
<td>90772535</td>
<td>Mr Mike Jones (received via email), Conservation Officer, RSPB</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
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<td>This policy refers to the general presumption in favour of sustainable development. Given the proximity to or presence within European designated sites of many of the proposed minerals allocations in this plan, it is important that this policy should also highlight that the general presumption in favour of permission does not apply to European wildlife sites (i.e. Special Protection Areas and Special Areas of Conservation).Clear reference should be made to paragraph 119 of the National Planning Policy Framework (NPPF) which highlight the additional requirements associated with planning applications in or near such areas. This policy refers to the general presumption in favour of sustainable development. Given the proximity to or presence within European designated sites of many of the</td>
<td>Exceptions to the presumption in favour of sustainable development are noted in part &quot;b&quot; of the policy. Where sites are in the proximity of European wildlife sites or other wildlife interests this is stated in site specific policies and supporting text.</td>
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proposed minerals allocations in this plan, it is important that this policy should also highlight that the general presumption in favour of permission does not apply to European wildlife sites (i.e. Special Protection Areas and Special Areas of Conservation). Given the precautionary approach required by the Habitats Regulations, we recommend that it would be acceptable to make clear reference to paragraph 119 of the National Planning Policy Framework (NPPF) which highlights the additional requirements associated with planning applications in or near such areas, in the supporting text of this policy, rather than the indirect reference currently proposed.

**Policy GP2: Climate Change Mitigation and Adaptation**

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| 90731458         | Mark North (received via email), Director of Planning Aggregates and Production, Minerals Product Association (MPA) | -                  | -      | -                                 | It is suggested that additional text is added to part e) of the above policy, to ensure a sensible approach is taken on the issue of travel plans, as follows;  

**Proposed Changes** (deletions in strikethrough; new text in bold)  
e) incorporate proposals for sustainable travel including travel plans where appropriate and **practical**.  

SCC considers the current wording acceptable. |
| 90764709         | Miss Charlie Christensen, Planning Advisor, Environment Agency               | Yes                | Yes    | Yes                               | We are supportive of this Policy relating to climate change adaptation and mitigation. We welcome the inclusion of a requirement to consider pluvial and fluvial flooding, rising sea levels and coastal erosion.                              | Noted.                                        |
**Policy GP3: Spatial Strategy**

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<tr>
<td>89424292</td>
<td>Mr Philip Dash (received via email), Senior Planner, Essex County Council</td>
<td>-</td>
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<td>The Spatial Strategy could reference that sites have been allocated for minerals and waste uses. The current wording states that “Preference will be given to proposals for minerals and waste development in accordance with the Key Diagram”. The Key Diagram on p16 does not include any existing or proposed allocations. The omission (of stating that there will be a preference towards applications coming forward on allocated sites) suggests that the Plan will support sites coming forward from anywhere provided they accord with the criteria which are mentioned in Policy GP3. This could be inferred as meaning that any sites (non-allocated sites) could come forward that are well-related (definition?) to ‘major centres of population’ and the ‘Suffolk Lorry Route Network’, ‘and do not have potentially significant adverse impacts upon features of environmental importance (natural or man-made) or endanger human health’. To allow for a Plan-led system, it is considered that the Spatial Strategy and Key Diagram should explicitly state that site allocations have been made for mineral and waste development and that applications on these sites will be supported subject to conformity with the wider Development Plan. Further, co-location and a preference for locating waste development on existing B2/B8 land is part of the spatial strategy devised by this Plan and yet this is only articulated in Policy WP3 rather than Policy GP3 – Spatial Strategy. It is considered that support for the co-location of facilities should be part of the spatial strategy policy where there are clear synergistic benefits of such co-location, and such proposals conform with the wider Development Plan.</td>
<td>Policy MP2: Proposed Sites for sand and gravel extraction, makes it clear that SCC supports planning applications on the sites listed in the policy as per the proposals map and Policy WP2 does this for waste. The key diagram is a “broad brush” approach and is not intended to provide site specific information. SCC is not seeking to be restrictive to unplanned sites that may come forward, provided that they comply with relevant policies in the plan. This provides the plan with flexibility. Including reference to locating waste sites on B2/B8 land in policy GP3 would be unnecessary duplication of policy, as it is already stated in WP3.</td>
</tr>
<tr>
<td>90559825</td>
<td>Beverley McClean (received via email), AONB Planning</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Policy GP3: Spatial strategy Preference will be given to proposals for minerals and waste development in accordance with the Key Diagram where individual sites are well related to the Suffolk Lorry Route Network (or rail network or navigation), major centres</td>
<td>Detailed consideration is a matter for the planning application stage. A Local Plan is concerned with the general principle of the development. Regarding the Court of Justice of the European Union (“CJEU”) People Over Wind and Sweetman v</td>
</tr>
<tr>
<td>Officer, AONB Team</td>
<td>of population and do not have potentially significant adverse impacts upon features of environmental importance (natural or man-made) or endanger human health. As already stated, we consider that it is premature to propose the allocation of new extensions to mineral sites within the AONBS or within the setting of the AONBs until all environmental impacts have been fully assessed. The current approach pushes the requirements for full environmental assessments i.e. detailed Landscape and Visual Impact Assessment, Habitats Regulations Assessment, ecological and archaeological assessment to the planning application stage which is considered too late in the process. With regards HRA specifically, the current methodology followed, and in light of the recent decision by the Court of Justice of the European Union (&quot;CJEU&quot;) People Over Wind and Sweetman v Coillte Teoranta (C-323/17) means that the SMWLP cannot be considered legally compliant with EU legislation. <strong>Minerals and Waste Key Diagram</strong> The Partnerships acknowledge that the Key Diagram has ow been amended to reflect the full extent of areas of constraints within the area covered by the SMWLP which is welcomed. Coillte Teoranta (C-323/17), SCC have done an appropriate assessment and has undertaken a focussed consultation. The comments regarding the changes made to the Key Diagram are noted.</td>
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<tr>
<td>90767232</td>
<td>There is a typographical error in g): it should be ‘dependent’ not ‘dependant’</td>
<td>This will be amended.</td>
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<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td>We would reiterate our previous comments about a lack of evidence of consideration of heritage assets at a county spatial scale. The evidence base and the spatial strategy do not adequately reflect the historic environment in order to inform the site selection (The Framework, paragraphs 143 (bullet points six), 169 and 170) We understand why individual scheduled ancient monuments or registered parks and gardens are not shown on the key diagram on page 15. as noted previousl, policy GP3 gives preference to those proposals which are in accordance with the key Diagram. There is no evidence of any underlying spatial analysis of concentrations of designated heritage assets to inform site selection or inform a bullet point on the historic environmetn in paragraph 4.10 which supports the spatial strategy as set out in the Key Diagram and policy GP3. We Minerals can only be worked where they occur and potentially viable resources of sand and gravel in Suffolk are limited in their extent. A site by site analysis has been undertaken and those sites that would have had an unacceptable impact upon the historic environment have been rejected (see site selection reports). Waste development is tightly constrained to sites in and around existing or proposed development areas. Any submitted sites have been assessed in terms of their impacts upon the historic environment (see site selection reports). In view of the above a broad-brush approach is not considered appropriate.</td>
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note that the Sustainability Appraisal in paragraph 2.3.11 gives heritage asset numbers and a broad sweep of the historic landscape character of the county, drawn from Chapter 6 Annex B, but this is not translated into specific analysis of sensitivities. To make the Plan sound, please include spatial analysis of the historic environment within the evidence base and use it to inform changes to paragraph 4.10 of the supporting text and the Key Diagram, if relevant.

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<tr>
<td>90764943</td>
<td>Miss Charlie Christensen, Planning Advisor, Environment Agency</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>We would like to see recognition here that aggregates recycling facilities should also be located where future infrastructure and housing will ensure markets for the recycled materials.</td>
<td>This is the intention of the policy.</td>
</tr>
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**POLICY GP4: GENERAL ENVIRONMENTAL CRITERIA**

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| 90446898         | Mr James Meyer, Suffolk Wildlife Trust | We support the comments made to this policy following our comments on the Preferred Options draft of the plan. However, there is a typo in the first sentence of the policy which should read “adequately assess” not “adequately access”. Correct “access” to “assess”.

Agree, typographical error will be corrected |

| 90627302         | Natalie Beal (received via email), Planning Policy Officer, The Broads Authority | • GP4 – The policy should also refer to the setting of protected landscapes. Query the use of ‘significant’ when referring to adverse impacts; even small negative impacts could cause considerable issues but this policy seems to allow impacts that are less than significant but are still negative impacts. How will a threshold be defined and upheld? Request this is changed to ‘adverse impacts’. We raised this at the last consultation. We would also suggest that the term ‘impacts’ be amended to ‘effects’. The impact is the development itself, the effect the result / consequence of the impact. Suggest amenity value be added to “setting” being added to part “C”. |

SCC sought to avoid repetition of the NPPF and other legislation and guidance, which is why for example the broads is not mentioned specifically, however the Broads Authority Area is included on the key diagram in policy GP3. The Broads Authority will of course be taken account of during any planning application, as it is required by the NPPF. The existing wording of “significant adverse impacts” is preferred to just “adverse impacts”. Add reference to “setting” being added to part “C”.

Suffolk County Council
incorporated into the list. The policy refers to ‘appropriate national or local guidelines for each criterion, including reference to any hierarchy of importance’—what are these and where can they be found? How will this policy be used and in particular this part of the policy? How will the special qualities of the Broads be taken into consideration and protected? The Broads has been identified by Historic England as an area with exceptional potential for waterlogged archaeology. Any excavation within or close to the executive area will require particularly robust archaeological evaluation prior to consenting and not rely on a brief desk based evaluation and conditions. Archaeology does not appear to be mentioned here.

SCC disagrees with the definition of “impact” suggested in this response. The way the word is used in the NPPF is that impacts are a potential result of development, not the development itself.

The intent of the policy is to deal with a number of amenity issues specifically related to minerals and waste activity, such as air quality, odours, nose, etc...

Archaeology is considered part of the historic environment part “f” of the policy.

| 90765110 | Miss Charlie Christensen, Planning Advisor, Environment Agency | Yes | Yes | Yes | We recognise the intention to keep the plan short, and we support that pluvial, fluvial, tidal and groundwater flood risk is highlighted in Policy GP4. However, we feel that the plan could be enhanced by including more specific requirements on flood risk considerations, both in general and for each site allocation. There is only a brief mention in the Suffolk Minerals and Waste Local Plan (SMWLP) Strategic Flood Risk Assessment (SFRA) that a site-specific Flood Risk Assessment (FRA) is required. We would like to see additional general information in the Plan outlining what should be included within the site-specific FRA. The SFRA does not provide any further information to that which is included in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). It would be beneficial for the SMWLP to include information on the following: 1. Finished floor levels 2. Flood resilience/resistance measures 3. Safe access 4. Emergency flood plan 5. Increases in built footprint 6. Climate change 7. JFLOW 8. Environmental permits for flood risk activities including that restoration projects may require a permit, or for a watercourse to be re-modelled. 9. That no storage of heaps within the floodplain will be allowed. The inclusion of this information in the Plan and as part of the allocation Policies would help to ensure that all the relevant information required to determine planning applications in Flood Zones 2 and 3 is provided. | As the plan is an in principle document the site specific information being requested is not included in the plan as it is now yet known. It is expected that these details would be established at the planning application stage. |
| 90767232 | Dr Natalie Gates, Historic England | We note amendments that have been made to supporting text in response to our previous comments | Noted. |
| 90767232 | Dr Natalie Gates, Historic England | We welcome that you have reviewed this policy in light of our previous comments. However, this policy remains unsound as it does not meet paragraph 143 of the Framework. In fact, Policy GP4 appears to include a similar list contained in bullet point 6 of paragraph 143 but not provide any environmental criteria against which planning applications will be assessed so as to ensure there are no unacceptable adverse impacts. The phrase "...meet or exceed the appropriate national or local guidelines for each criterion." is unclear. It would be clearer to state wording such as "...the relevant national legislation or national planning guidance and..." if there were concerns about specifying the Framework and the National Planning policy Guidance. The reference to local guidance is both vague and also could provide inconsistency, if the plan is relying on local development plans in the districts and boroughs. As this policy underpins all the other policies in the plan, as drafted, this policy undermines the soundness of the entire plan. In order to make the Plan sound, please amend the policy to better reference including national legislation, national planning guidance etc and also please include specific criteria for the historic environment against which applications will be assessed. An alternative approach would be to increase the historic environment specific criteria in every relevant policy; however, this would be a repetitive process given the Plan should be read as a whole. The existing approach is preferred not least because relevant guidelines are for ever changing. For example the NPPF has been updated twice in the last six months. It is obvious to users of this policy that they must familiarise themselves with and follow the relevant guidance. It is recognised that planning relies on expert input in respect of these issues however it is not considered desirable or even feasible to list everything. |
| 90818618 | Farah Chaudry (received via email), Team Leader, Norfolk & Suffolk, Natural England | - | - | Policy GP4 General environmental criteria |
| 90818618 | Farah Chaudry (received via email), Team Leader, Norfolk & Suffolk, Natural England | - | - | We suggest adding the following text to ensure that the Local Plan is compliant with Habitats Regulations:

"Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitats Regulations at project application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the project will have to be refused or pass the tests of Regulation 62, in which case any..."

This would fall under clause "(d)" and the final paragraph. An Appropriate Assessment of the Plan has been carried out. Further project Appropriate Assessments will be carried out by the applicants in support of their planning applications. It is not the purpose of the SMWLP to restate other legislation and guidance.
Policy GP4: General environmental criteria

Proposed modifications to GP4

The Partnerships consider that the following modifications shown in bold are needed to policy GP4:

Minerals and waste development will be acceptable so long as the proposals, adequately access assess and address the potentially significant adverse impacts upon:

b) vehicle movements, access and the wider highways network and impacts on the rural road network in particular for non-motorised road users.

c) landscape character, visual impact, and protected landscapes including significant adverse impacts upon the natural beauty and special qualities of the AONBs

d) biodiversity within statutory protected sites and non-designated sites

e) geodiversity with statutory protected sites and non-designated sites

f) historic environment and heritage assets including cultural heritage assets

g) public rights of way and users enjoyment of the network

These modifications which were previously proposed in response to the Preferred Options consultation are considered necessary to ensure that the natural beauty and the special qualities of the AONB are fully recognised within the SMWLP and to ensure compliance with paragraphs 115, 143 and 144 of the NPPF and the respective Management Plans for the Suffolk Coast & Heaths and the Dedham Vale AONBs.

| 90559825 | Beverley McLean (received via email), AONB Planning Officer, AONB Team | - | - | necessary compensatory measures will need to be secured. | Agree, typographical error will be corrected. | In respect of the other proposed amendments: b) the proposed emphasis is inappropriate and unbalanced; c) the proposed emphasis is inappropriate and unbalanced; d) the proposed wording is unnecessary; e) the proposed wording is unnecessary; f) the proposed wording is unnecessary, and; g) the proposed wording is unnecessary. |
89503647 | Corinne Meakins (received via email), Local Partnership Advisor, Forestry Commission East and East Midlands | - | - | Thank you for consulting the Forestry Commission on the Suffolk Waste and Minerals Plan Submission draft. The Forestry Commission is a non-statutory consultee on developments in or within 500m of ancient woodland and we are also Statutory Consultees for restoration of waste and mineral sites to forestry and the competent authority for Environmental Impact Assessments (forestry). Our role as a Government Department is to provide you with any information which can help you in decisions with regard to proposals which may impact on Ancient Woodland in particular and any other woodland where it may be relevant to your plans. We note in the General Principles Document the GP4 list of criteria. We feel that Ancient Woodland (ASNW and PAWs) should be mentioned specifically in here as they are irreplaceable habitat, whilst there is a mention of biodiversity: ASNW provides not just biodiversity but a large number of other eco system services as well as being one of the most significant natural capital assets. It is also Government policy to expand and protect woodland. Ancient Woodland as it is an irreplaceable habitat is a particular concern and in order to help Planning Authorities the Forestry Commission has prepared joint standing advice with Natural England on ancient woodland and veteran trees. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. | Ancient Woodland is covered under clause “d) biodiversity.” |

9052229 | Bethany Philbedge (received via email), Planning Officer, Suffolk Preservation Society | - | - | The Society commented on the Preferred Options consultation on this Minerals and Waste Local Plan document on 11 December 2017 and have noted the officers’ response to our comments in the Responses to the Preferred Options Consultation document (March 2018). We have the following further comments on the Pre-Submission consultation document: Policy GP4: General Environment Criteria: The inclusion of the ‘setting’ of heritage assets in criteria f) following our response to the previous consultation is welcomed. However the first sentence of the policy now requires amendment as follows: The difference in approaches to archaeology for Wangford and Wherstead are due to the different level of information currently available regarding the archaeology on these sites. In the case of Wangford, this site is relatively large (24 ha). High archaeological potential is indicated by its topographic location and evidence from aerial photography and records held on the HER, including the results of excavation associated with previous phases of quarrying nearby. However, at the time of writing no field investigation (of any form) had been undertaken on the site itself, therefore, the scale, extent and quality of any heritage assets present was an unknown. Furthermore, the size of the site and the |
Minerals and waste development will be acceptable so long as the proposals, adequately assess and address the potentially significant adverse impacts upon:

Archaeology

The Society continues to consider that the general approach to archaeology is inconsistent, predetermination evaluation being requested in some but not all of the proposed allocations without adequate reasons given. Best practice dictates that archaeological evaluation should be undertaken at the pre-determination stage in all cases and not via condition, unless it relates to a very small extension to an existing quarry. In order to establish the full archaeological implications of these large allocation areas – which have not been the subject of any previous systematic archaeological investigation – archaeological field evaluation to accurately quantify the archaeological resource (both in quality and extent) should be carried out prior to determination of any application. This is in accordance with the NPPF (paragraphs 128, 129 and 132).

MS9: Wherstead and MS7: Wangford, Archaeology

Following our comment highlighting the inconsistent approach to archaeology between the sites at Wherstead and at Wangford which are considered to have similar potential, the Responses to the Preferred Options Consultation document (March 2018) stated that changes would be made to ensure consistency between these sites. However MS9: Wherstead and MS7: Wangford continue to set out different approaches; schemes of archaeological investigation being required pre-application for the Wangford site but secured via planning condition for the Wherstead site. MS7: Wangford and MS6: Tattingstone, Designated AONB Landscapes - The MS7: Wangford site is within the Suffolk Coast and Heaths AONB and, if it is assessed that an overriding need for the development exists, appropriate mitigation must be provided to minimise harm to the AONB in terms of landscape character and detrimental impacts on tranquility. The retention of hedgerow boundaries and further planting to screen the operational areas of the site will be required and we note the proposed use of bunds. The use of bunds to restore the landscape however will be inappropriate as they are an alien feature within this sensitive landscape. The close proximity of the MS6: Tattingstone site to the proposed absence of any field investigation makes it more likely that previously unidentified archaeological remains that may be worthy of preservation in situ, may be present. Therefore, it was recommended that a programme of archaeological investigation should be required to inform planning consent.

By contrast the site at Wherstead is considerably smaller (11 ha). Good archaeological potential was also indicated by its topographic location and evidence from the HER (including the results of excavation associated with previous phase of extraction) and aerial photography. However, in this instance the land identified for inclusion in the Minerals Plan, had also been subject to low level field investigation. This included a fieldwalking survey, and an archaeological monitoring of a water pipeline that crosses the site. The results of both investigations identified archaeology, but no focusses of material within the site which would suggest archaeological remains of sufficient quality or importance to require preservation in situ. Based on this, and the nature of the archaeological remains identified on previous phase, it was reasonable to recommend a programme of archaeological investigation secured by condition, to ensure appropriate mitigation for impact on any heritage assets encountered.

With regards to the AONB it is expected that landscape features such as field boundaries will be retained. At the planning application stage a detailed assessment of the impacts on landscape and identify any further mitigation not yet identified will be required. Sites within the Settings of the AONB will be expected to assess and address impacts on the AONB as part of proposals.
revised boundary of the Suffolk Coast and Heaths AONB
must inform the scheme of mitigation to minimise the
landscape harm of the extension to the site. In particular the
use of bunds is inappropriate in restoring the landscape as
they are an alien feature within this landscape which is in
the setting of the AONB.
## 6. Minerals Policies

**Policy MP1: Provision of Land Won Sand and Gravel**

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<tr>
<td>89424292</td>
<td>Mr Philip Dash (received via email), Senior Planner, Essex County Council</td>
<td>-</td>
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<td>-</td>
<td>The general approach of allocating a 'safety margin' over and above a strict adherence to 10 year sales is supported. It is however noted that the appropriateness of this margin is not evidence-based and it therefore may be challenged by third parties. Whilst recognising the difficulty behind producing quantifiable evidence that would satisfy the 'other relevant information' NPPF requirement, it is suggested that further consideration could be given to justifying allocations amounting to 14,770mt against a calculated need of 9,300Mt.</td>
<td>As explained the plan as a whole allocates sites for up to 14,770mt, it is only expected that 12.9mt will be extracted during the plan period. This is a 31% overprovision of the 10 year average sales. This is linked to the housing delivery rate in Suffolk, which is 35% lower than planned, so there is additional provision in case of an increase in housing delivery to meet planned rates, which could increase aggregate demand. Significant infrastructure projects planned in Suffolk, however, the quantity of aggregate needed from local sources is unknown. Major road schemes have previously used imported crushed rock or borrow pits. Sizewell C will do likewise although it is estimated that approximately 5Mt of sand and gravel would be supplied from Suffolk and the surrounding counties. It is still uncertain whether Sizewell C will be built however. This is to be set out in the latest draft Local Aggregates Assessment (2018 data).</td>
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<tr>
<td>90612426</td>
<td>Mr Peter Orrock (received via email), Mineral Services LTD</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>I set out below my response below on behalf of Mineral Services Ltd in relation to the above Consultation. I have also sent to you by email a copy of my response for your files. Following the Issues &amp; Options Consultation in November 2016, together with the Preferred Options Draft in October 2017, the changes that have been made to the General policies, Mineral policies and Waste polices in the Submission Draft June 2018 are all supported with the exception of my concerns regarding Policy MP1, MP6, MP7 and WP8. Policy MP1</td>
<td>Due to the 5 year review process for local plans it is not considered necessary to have a landbank after the plan period, as the plan will be reviewed before the end of the plan period. Regarding the inclusion of new sites into plan reviews, the plan does not seek to be overly restrictive and additional sites can be permitted, provided that they comply with policies within the plan. This enables the plan to be flexible.</td>
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The Policy as drafted does not make it clear that the 7 year land bank should not only be maintained through the Plan period but also at the end of the Plan Period. May I suggest that a simple sentence is added to the Policy confirming that the 7 year land bank will be maintained at the end of the Plan Period to make this clear? I note that the Council ‘will seek to maintain a landbank of permitted reserves of at least 7 years ... etc’. I also note NPPF paragraph 145 bullet point 6 the second sentence reads ‘longer periods may be appropriate to take account of the need to supply a range of types of aggregates, locations of permitted reserves relative to markets, and productive capacity of permitted sites’. It may therefore be appropriate to include this sentence in the text to allow for new sites which are closer to the market than existing permitted sites to be identified at the earliest opportunity within the Plan review process.

| 90616219 | Mr Chris Hemmingsley (received via email), Senior Planning Manager, Brett Group | - | - | Following the ‘Preferred Options’ Consultation in December 2017, Wt? welcome the changes Suffolk County Council (SCC) have made incorporated into the submission draft plan document. Brett are therefore supportive of the Submission Draft Plan in principle, however, we would like to make further representation in regard to specific policies as set out below:

**Policy MP1**

Brett welcome SCC’s Proposed Change which sees the ‘addition of an assessment of other relevant information, the 3 year average, and the need to review’ being added to the supporting text. However, Brett continue to stand by comments raised in its 11th December 2017 consultation, in that in line with the NPPF there needs to be a commitment to ‘at least’ a seven year land bank which also includes provision of such at the end of the plan period (2036). While it is not explicit in the plan SCC do intend to review the plan within 5 years. Due to the 5 year review process for local plans it is not considered necessary to have a land bank after the plan period, as the plan will be reviewed before the end of the plan period, which is required by the updated NPPF. |

| 90731458 | Mr Mark North (received via email), Director of Planning Aggregates and Production, | - | - | Para 5.1

We believe the text needs altering to make it clear that NPPF requires SCC to plan for a steady and adequate supply of aggregates. The following wording is suggested:

**Proposed Changes** (deletions in **strikethrough**; new text in **bold**)

- The NPPF requires that Minerals Planning Authorities, including Suffolk County Council, **should** plan for a steady and adequate supply of aggregates.

Paragraph 5.1: Here SCC is reiterating the purpose of the plan as stated in the NPPF, where the wording in paragraph 145 states “minerals planning authorities should plan for …”. Ten years average sales indicates that the Plan needs to provide 9.3 Mt of sand and gravel to ensure a supply to the end of the plan period. It is expected that the sites within the plan will provide 12.18 Mt within the plan period (and 14.770 Mt in total). This is
| Minerals Product Association (MPA) | Provision of land won sand & gravel | an over provision of 31% within the plan period, which will provide the flexibility required to provide and adequate supply, and address the issue of the 3 year average being slightly higher than the 10 year average, if this does indicate an upward trend in sales. For additional flexibility the plan is not overly restrictive in respect of allowing additional sites to come forward, provided planning applications comply with the policies within the plan. While it is not explicit within the plan SCC does aim to review the plan within 5 years. As a review will take place within 5 years there is no need to provide a 7 year land bank at the end of the plan period. The plan uses the 10 years sale average as a starting point for identifying the required provision within the plan period. However, the plan also takes into account that housing rate delivery needs to increase by 35% in order to provide the planned number of homes. As a result the plan allocates sites containing a total of 31% over the 10 year average sale figure. This provides flexibility within the plan to enable increased supply if this is required. Taking into account a review after five years there is no need to provide a 7 year land bank at the end of the Plan period in order to maintain a landbank of at least 7 years. |

The statements contained within the section extending from para 5.23 to 5.30, which Policy MP1 is predicated, we believe will make the Plan unsound and not effective as they are not in accord with the NPPF. The reliance exclusively on the 10-year average is wrong in terms of National Planning Policy. It is accepted that the National Guidelines are out of date and that this makes it a challenge for mineral planning authorities when producing new plans. While the NPPF (para145) indicates that 10-year sales average should be looked at in assessing demand, it also requires that other relevant local information be considered. Local factors that need to be taken into consideration are housing and commercial new build as well as highway and infrastructure proposals. Furthermore, it needs to be made clear that the aggregate provision will be kept under review through the LAA process also considering the last 3 years aggregate sales as required by the Minerals PPG at paragraph 64 to identify the general trend of demand as part of the consideration of whether it might be appropriate to increase supply. As currently proposed the Plan does not have this flexibility required by NPPF and PPG. On the topic of flexibility, it is important to recognise the 10 years up to 2016 (the end date proposed by Suffolk) saw a deep recession and therefore all the policy tools outlined above need to be used to ensure the Plan is sound and effective. Additionally, a clear statement need to be made about the review of the plan as required by PPG (Local Plans) para 008 which states that Local Plans will require reviewing in whole or part at least every five years. Furthermore The Town and Country Planning (Local Planning) (England)(Amendment) Regulations 2017, regulation 4 "Review of local development documents" states that reviews of local plans must be completed every five years, starting with the date of adoption of the local plan. This will allow increased flexibility to allow the Plan to react to increased demand. There also needs to be an explicit commitment to have at least a seven-year landbank at the end of the plan period.
This section needs to be rewritten to properly reflect National Planning Policy and Guidance. This policy is unsound and not effective for the reasons set out in the discussion above and needs to be redrafted to properly reflect NPPF. The policy also needs to make it clear that at least 7 years of sand and gravel reserves will exist at the end of the Plan period.

<table>
<thead>
<tr>
<th>Reference</th>
<th>Commentator</th>
<th>Details</th>
<th>Note</th>
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</thead>
<tbody>
<tr>
<td>90551387</td>
<td>Mr Shaun Denny</td>
<td>(received via post), Development Planner, Cemex UK Operations Limited</td>
<td>Not applicable</td>
</tr>
<tr>
<td>90820847</td>
<td>Mr David Fletcher</td>
<td>(received via email), Senior Associate Director, Strutt &amp; Parker on behalf of H R Philpot &amp; Sons</td>
<td>See links below:</td>
</tr>
</tbody>
</table>


**Lack of Robust Assessment of Growth in the Future**

The local aggregates assessment states that the plan needs to allocate sites containing 9.3 Mt of sand and gravel to account for the shortfall in the landbank to 2036. The plan allocates 14.770 Mt, and it is expected that 12.180 Mt of this total allocated figure will be worked in the plan period. The 12.180 Mt figure is 31% over the shortfall in provision and the 14.770 Mt figure is 63% over the shortfall. This enables flexibility in the supply over the plan period, should an allocated site not come forward.

Furthermore, the presumption in favor of sustainable development is inherent within the plan and incorporated within Policy GP1. The plan does not seek to be overly restrictive and the policies within the plan allow for non-allocated sites to come forward, provided they comply with policy criteria.

SCC takes part in the East of England Aggregates Working Party (EEAWP), where the Suffolk Local Aggregate Assessment was submitted for comment and approval. The document was approved by the EEAWP, which was confirmed by letter from the EEAWP chairman. EEAWP meetings are attended by both East of England local authorities and representatives of the minerals industry.
Number of Allocated Sites

Suffolk County Council do not consider that competition is being stifled. The 10 allocated sites were put forward by seven different operators. One of these operators has not operated as a mineral extractor in Suffolk and one of the sites does not have an operator associated with it. The plan has enabled a new operator in Suffolk and provided a further opportunity for a new operator to enter Suffolk.

Furthermore, SCCs safeguarding policies (MP10) allow for further diversification of supply, by enabling SCC to work with local planning authorities with regards to prior extraction, which allows further opportunities for operators to enter the market in Suffolk. SCC does not consider that the number of allocations stifle competition.

It has not been made clear in the representation why 10 sites are inadequate.

Lack of apportionment figure

The NPPF does not just require minerals planning authorities to consider the last 10 years rolling sales, but also “other factors”, which Suffolk has done in paragraph 3.9 of the LAA and is the reason why considerable flexibility has been built into the plan and the quantity of minerals allocated.

Land at Holton St Mary Proposal

SCC considers that as it is meeting the need for sand and gravel as set out in the Plan, including a significant safety margin. Furthermore, it is not possible to include a further site prior to Submission of the Plan even if the issues mentioned in the Site Selection Report have been addressed. Further analysis of those issues are now being undertaken to inform the Examination in Public.
**POLICY MP2: PROPOSED SITES AND SAND AND GRAVEL EXTRACTION**

<table>
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<tr>
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<th>Representation</th>
<th>SCC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>90762482</td>
<td>Mr Tom Hill, Chairman, The Stour and Orwell Society</td>
<td>No</td>
<td></td>
<td></td>
<td>In respect of the General Minerals Policies set out in Chapter 5 and in particular at paragraphs 5.31-5.34, SOS disputes that it is necessary or sensible to plan for such a large over-provision. There is a shortfall of 9.3 Mt over the very lengthy 20 year plan period. Yet it is proposed to allocate land for 14.77 Mt. This is nearly a 60% excess. Even assuming that only 12.180 Mt is worked during the plan period, that is a 31% excess. Mineral workings are not benign, but often result in complete displacement of land uses, noise and disruption to communities and to ecosystems and the disfigurement for lengthy periods of beautiful and historic landscapes. There is a completely inadequate justification in the consultation document for the gross overprovision in the plan, which will also act as a discouragement to sustainable investment in recycled aggregate products. This gross over-provision can be addressed in part by deleting some of the poorest sites. SOS's area of interest is inevitably spatially restricted and comments are confined to this area. Generally, we would ask where do we find consideration of the setting of the Suffolk Coasts &amp; Heath AONB and its hinterland, the AONB Additional Project Area or the Dodnash Special Landscape Area? SOS requests deletion of the Tattingstone (0.9mt) and Wherstead (0.5mt) allocations, which would reduce provision by only 1.4mt (less during the plan period), leaving a more reasonable 16% excess.</td>
<td>SCC considers the excess provision supply appropriate in order to provide a adequate and flexible supply of sand and gravel. As outlined in the Plan, Suffolk is currently under delivering housing growth. In order to achieve the planned level of growth delivery would need to increase by approximately 35%. Additionally, flexibility of supply is required as some sites may not come forward, or more detailed assessments of site at the planning application stage could cause a reduction in the quantity of material that can be extracted from a site. Policy GP4 should address the amenity, ecology, and landscape issues which are raised by sand and gravel extraction requiring impacts to be minimised and mitigated.</td>
</tr>
<tr>
<td>90762482</td>
<td>Mr Thomas Hill QC</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1. The Stour &amp; Orwell Society (“SOS”) has considered its representations in Committee and these are now set out</td>
<td>SCC considers the excess provision supply appropriate in order to provide a adequate and</td>
</tr>
</tbody>
</table>
below. Representations are confined to 4 topics: (1) overall provision as described in paragraphs 5.31-5.34 of the Draft Plan and (2) to (4) proposed minerals sites at Belstead (MS3), Tattingstone (MS6) and Wherstead (MS9).

2. In respect of the General Minerals Policies set out in Chapter 5 and in particular at paragraphs 5.31-5.34, SOS disputes that it is necessary or sensible to plan for such a large over-provision. There is a shortfall of 9.3 Mt over the very lengthy 20 year plan period. Yet it is proposed to allocate land for 14.77 Mt. This is nearly a 60% excess. Even assuming that only 12.180 Mt is worked during the plan period, that is a 31% excess. Mineral workings are not benign, but often result in complete displacement of land uses, noise and disruption to communities and to ecosystems and the disfigurement for lengthy periods of beautiful and historic landscapes. There is a completely inadequate justification in the consultation document for the gross overprovision in the plan, which will also act as a discouragement to sustainable investment in recycled aggregate products.

3. This gross over-provision can be addressed in part by deleting some of the poorest sites. SOS’s area of interest is inevitably spatially restricted and comments are confined to this area. Generally, we would ask where do we find consideration of the setting of the Suffolk Coasts & Heath AONB and its hinterland, the AONB Additional Project Area or the Dodnash Special Landscape Area?

4. SOS requests deletion of the Tattingstone (0.9mt) and Wherstead (0.5mt) allocations, which would reduce provision by only 1.4mt (less during the plan period), leaving a more reasonable 16% excess.

---

flexible supply of sand and gravel. As outlined in the Plan Suffolk is currently under delivering housing growth. In order to achieve the planned level of growth delivery would need to increase by approximately 35%. Additionally, flexibility of supply is required as some sites may not come forward, or more detailed assessments of site at the planning application stage could cause a reduction in the quantity of material that can be extracted from a site. Policy GP4 would address the amenity, ecology, and landscape issues which are raised by sand and gravel extraction requiring impacts to be minimised and mitigated.
### POLICY MP3: BORROW PITS

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<tbody>
<tr>
<td>89424292</td>
<td>Mr Philip Dash (received via email), Senior Planner, Essex County Council</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>The 10km distance limit between borrow pit and facilitated project is questioned in the absence of evidence. Further, the current policy wording does not seem to act to stop extraction continuing beyond that required for the particular major (definition?) civil engineering project – only that it serves and is reclaimed as part of the project. It is considered that the policy may be more effective if the distance limit is removed. The policy could also require the applicant to demonstrate an overriding justification or benefit as to why a borrow pit is more appropriate than relying on existing allocated sites to preserve the integrity of a site-specific plan. It should also be qualified that the amount of mineral to be extracted should be that which is only required to supply the project, unless there are overriding reasons as to why further material should be extracted.</td>
<td>The supporting text indicates that the advantage of borrow pits is that they are very close to the construction project and can access the project without using public roads. Recent experience in Suffolk suggest that this can achieved from a site distance 7km away from the nearest part of the road construction site and hence the 10km limit. The way this policy is intended to work is that (as stated in part &quot;b&quot; of the policy) the duration of the pit is directly linked to the duration of the construction project, and that the pit should be worked and reclaimed within the period of construction. The wording of this part of the policy stating the borrow pit is worked as part of the project, would also prevent the mineral being used for other purposes. Requiring justification for not using existing quarries would be anti-competitive.</td>
</tr>
<tr>
<td>90616219</td>
<td>Mr Chris Hemmingsley (received via email), Senior Planning Manager, Brett Group</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Policy MP3 It is noted that SCC have not responded to comments raised by Brett in regard to Policy MP3. Whilst welcoming policy MP3 in regard to the potential use of ‘Borrow Pits’, we would again like to reiterate our comments from the past two rounds of consultation in that flexibility should be brought into the policy to ensure that an existing quarry may also be considered to supply major civil engineering projects. The benefits of one compared to another should be evaluated on a case by case individual merits basis ensuring that a borrow pit does not overtly impact on the continued supply of mineral from, or adversely impact on the restoration of, existing quarry sites.</td>
<td>The comments are noted however the policy does not exclude existing quarries from supplying major civil engineering projects.</td>
</tr>
<tr>
<td>90731458</td>
<td>Mr Mark North</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>The text in para 5.35 reasonably explains the purpose of a borrow pit. The last sentence is key and states that;</td>
<td>Regarding off road access, recent experience in Suffolk suggest that this can achieved from a site</td>
</tr>
</tbody>
</table>

Suffolk County Council
The main advantage of borrow pits is that they are normally very close (emphasis added) to the construction project and are often connected to that project by routes which do not use the public highway.

Therefore, it seems odd that the Policy MP3 requires that borrow pits are *within 10KM* of the project site. In such a case how is it possible to stay off the public highway as indicated in 5.35. It is accepted that a borrow pit is usually adjacent and contiguous to the engineering project it serves.

While recognising the sustainability advantages of borrow pits providing mineral to adjacent engineering projects it is important that there is a level playing field for traditional existing and allocated quarries and the capital expenditure invested. As such it is felt that the policy is not effective needs redrafting and suggested wording is set out below:

**Proposed Changes** (deletions in strikethrough; new text in bold)

Policy MP3:  
*Borrow pits.* Borrow pits to provide sand and gravel to serve major civil engineering projects will be acceptable as long as:  
1. they are within 10 km of the project site;  
2. the borrow pit is worked and reclaimed as part of the project;  
3. they comply with the general environmental criteria Policy GP4.

The supply of sand and gravel will be drawn from existing or allocated sites. Sand and gravel borrow pits will only be considered where it is demonstrated that:  
a. geographically they are well related to the project they will serve;  
b. the quantity and timescale for the supply of sand and gravel may not pose problems of supply from existing quarries, or prejudice the steady supply of construction material for the local market;  
c. distance 7km away from the nearest part of the road construction site and hence the 10km limit.

The 10km limit should ensure that the borrow pit is well related to the project geographically, the life of the borrow pit will is linked to the project it serves by part "b" of the policy, and the policy is explicit that the material will only go to the project the borrow pit is related to.

Requiring justification for not using existing quarries would be anti-competitive.
c. an unacceptable level of mineral traffic, and/or movements of unsuitable material arising from the scheme, will be removed from the public highway and/or from passing through local communities;
d. the site will be restored within the same timescale as the project to which it relates, and that restoration can be achieved to an approved scheme if it is only part worked;
e. there will be no importation of materials other than from the project itself unless required to achieve beneficial restoration as set out in an approved scheme.

**Policy MP4: Agriculture and Public Supply Reservoirs**

No comments received

**Policy MP5: Cumulative Environmental Impacts**

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<tbody>
<tr>
<td>90616219</td>
<td>Mr Chris Hemmingsley (received via email), Senior Planning Manager, Brett Group</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Policy MP5 SCC have commented on the previous Brett consultation response confirming that he NPPF and Planning practice guidance recommend plans include policies on cumulative impact. It is considered by SCC appropriate that a cumulative impact policy is included in this plan. Whilst Brett agree that NPPF states that in preparing Local Plans, local authorities should ‘... take into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality’, we would reiterate our comments from the previous consultation responses in that minerals can only be worked where they occur and therefore mineral sites are often in close proximity to each other. It was demonstrated in the last MLP review at a site in Kirton that phasing of sites, particularly cross-operator, is unfeasible and lead to a site being stymied by another operator's site. Therefore, it is considered that physical location of mineral and the wording of this policy is intended to add flexibility and enable sites to come forward. If a site is unacceptable due to cumulative impact and mitigation is unable to deal with these impacts the only other option would be to refuse permission to the site. Phasing of sites provides an alternative to a site that is acceptable in its own right, but might be refused due to cumulative impact.</td>
<td></td>
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Market demand should drive the need argument with cumulative impact being a matter to be addressed through the screening/scoping exercise as part of the EIA process and be looked at on a site by site basis at the detailed application stage.

<table>
<thead>
<tr>
<th>90612426</th>
<th>Mr Peter Orrock (received via email), Mineral Services LTD</th>
<th>-</th>
<th>-</th>
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<tr>
<td></td>
<td>I note the County Council’s response to my earlier concerns over former Mineral Policy 6, which now becomes Minerals Policy 5, in the Submission Draft. However, I would like to reiterate that Policy MPS: Cummulative environmental impacts and phasing of workings, remains unchanged from the Preferred Options Consultation document. I note that the National Policy Planning Framework, paragraph 143 (bullet point 6) which states that ‘In preparing Local Plans, local authorities should: ........... take into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality’. Policy MP5 as set out states that ‘Where a proposed minerals site is considered acceptable (in its own right) but the cumulative impact of a proposal in conjunction with other existing, permitted or allocated minerals sites in the proximity is considered unacceptable, the proposal may be considered acceptable if phased so that one site follows the completion of the other or that it can be demonstrated that the adverse cumulative impacts can be adequately mitigated.’ Minerals can only be worked where they occur and mineral sites are often in close proximity to each other. It is understood that there may be cumulative impacts by two sites working in the same locality but to rely on the phasing of two sites, run for example by two different operators, may lead to one site simply closing down to prevent another coming forward. This would stifle competition and distort market supply. It is therefore suggested that the Policy MP5 might be reworded as follows: Where a proposed minerals site is considered acceptable (in its own right) it must be demonstrated that the adverse cumulative impact of the proposal in conjunction with other existing, permitted or allocated minerals sites in the proximity can be adequately mitigated.</td>
<td>The wording of this policy is intended to add flexibility and enable sites to come forward. If a site is unacceptable due to cumulative impact and mitigation is unable to deal with these impacts the only other option would be to refuse permission to the site. Phasing of sites provides an alternative to a site that is acceptable in its own right, but might be refused due to cumulative impact.</td>
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### **Policy MP6: Progressive Working and Restoration**

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<tbody>
<tr>
<td>89424292</td>
<td>Mr Philip Dash (received via email), Senior Planner, Essex County Council</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>It is considered that this policy should reference the multi-faceted benefits that a ‘green infrastructure’ approach to mineral site restoration can bring. Mineral site restoration creates a strong opportunity to ‘start again’ in terms of what the land could offer, such as public health and recreational benefits, and restoration outcomes could therefore be linked to any existing green infrastructure work already carried out at the County or district level.</td>
<td>Noting Essex County Council's previous comments from the preferred Options Consultation, SCC included in this policy the clause &quot;providing links to surrounding habitats is also encouraged&quot;. This is to encourage developers to link into existing green infrastructure where possible, but also into wider habitat that is not strictly designated as green infrastructure, but still has potential biodiversity or recreational value.</td>
</tr>
<tr>
<td>89503647</td>
<td>Corinne Meakins (received via email), Local Partnership Advisor, Forestry Commission East and East Midlands</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Our last point relates to the restoration of sites. With the government policy of expansion of woodlands we would encourage Planning Authorities to consider new woodland planting as part of any planned restoration, in particular where it can be used to link two isolated woodlands. Should it be necessary to use a site which will have an impact on an Ancient Woodland this would as already mentioned above, require compensatory planting and restoration and there are methods for doing this, we can provide further advice on this please don’t hesitate to contact us.</td>
<td>Policy MP6 already covers this point.</td>
</tr>
<tr>
<td>90447394</td>
<td>Mr James Meyer, Suffolk Wildlife Trust</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>We support the intention of this policy to ensure that restoration proposals secure net gain for biodiversity. Restoration of minerals sites offers significant opportunities for enhancing biodiversity, including to help meet local and national targets for habitat creation. The minerals planning system has the potential to play a fundamental role in halting biodiversity loss and creating a coherent and resilient ecological network. We therefore consider that it is important that this policy secures maximum ecological enhancements as part of all restoration proposals.</td>
<td>Noted.</td>
</tr>
<tr>
<td>90612426</td>
<td>Mr Peter Orrock (received via email)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Policy MP6 (former Policy MP7 in the Preferred Options Consultation): Progressive working and restoration. This policy begins with the exact wording of DC8 namely ‘Proposals for new mineral working should be</td>
<td>Paragraph 109 of the NPPF states &quot;The planning system should contribute to and enhance the natural and local environment by... minimising impacts on biodiversity and providing net gains in biodiversity&quot;</td>
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Suffolk County Council
Mineral Services LTD | accompanied by a scheme for the progressive working and restoration of the site throughout its life' which is supported. I note the comments by Suffolk County Council in relation to my Policy MP6 in the Preferred Options Consultation; however I would like to reiterate my concern. The second part of Policy MP6 continues 'Preference will be given to restoration proposals that incorporate a net gain for biodiversity with the creation and management of priority habitats and that support protected priority and Red Data Book Species and/or conserve geological and geomorphological resources. Such habitats, species and resources should be appropriately and sustainably incorporated into restoration proposals focused on flood alleviation, reservoirs, agriculture, forestry, amenity, or ecology. Providing links to surrounding habitats is also encouraged.' This second part of Policy MP6 is based on DC7 which states, in the second sentence that 'Preference will be given to after-uses that promote the creation and management of priority habitats listed in the Suffolk BAP and/or that conserve geological and geomorphological resources.' The introduction of a 'net gain for biodiversity' was not considered in the Issues & Options Consultation and may lead to undue complication. It is understood that preference will be given to after-uses that promote the creation of priority habitat etc but the calculation for a net gain for biodiversity is complex and will change both according to the time period and also with the future management of the land. May I suggest in addition that the Plan should provide encouragement for restoration back to agriculture, particularly if the quality of the restored land can be improved which will lead to more sustainable food production? Given that the UK is leaving the European Union, the independence of food production for the UK will be an important issue. The additional wording within Policy MP6 which introduces a 'net gain for biodiversity' is therefore not supported. | The restoration of quarries presents an opportunity for gains in biodiversity and it is appropriate to include policies to encourage this. Additionally policy MP6 does not exclude other forms of restoration, such as agricultural. The point being that a net gain for biodiversity can potentially form part of many different forms of restoration. |
<table>
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<tr>
<th>Reference</th>
<th>Name</th>
<th>Role</th>
<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>90616219</td>
<td>Mr Chris Hemmingsley (received via email) , Senior Planning Manager, Brett Group</td>
<td>-</td>
<td>It is noted and welcomed that various restoration 'options' are now listed in Policy MP6, however, we continue to have concern in regard the emphasis on, and preference for, biodiversity restoration. Whilst noting the words 'net gain' and appreciating the potential for flexibility here, we note caution that any calculation for a net gain for biodiversity is likely to be complex and will change according to both the time period and also the future management of the land. We trust that each restoration will be judged on a site by site basis on its own merits whilst recognising the aims of SCC to achieve net gains for nature as well as their aspiration of 'Creating the Greenest County'.</td>
</tr>
<tr>
<td>90627302</td>
<td>Natalie Beal (received via email) , Planning Policy Officer, The Broads Authority</td>
<td>-</td>
<td>• There seems to be no guiding restoration policy. MP6 refers to restoration but only emphasises biodiversity net gain rather than giving guiding principles of restoration. Why is there no such guiding policy? • Policy MP6: query the wording 'preference will be given' in relation to proposals that incorporate a net biodiversity gain. Would 'proposals will be supported' or 'proposals need to…' be a better and stronger phrase? SCC consider that it is more appropriate to consider the details of restoration at the planning application stage, however the policy does state what post extraction uses are acceptable, but has a preference for net-biodiversity gain. SCC consider that &quot;preference&quot; is the appropriate term.</td>
</tr>
<tr>
<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td>-</td>
<td>As noted in our previous comments, the policy makes no reference to how progressive working and restoration should be used to mitigate the impact on the historic environment (The Framework, paragraph 143 (bullet point 8)). These criteria should be specific to progressive working and restoration and are not covered by Policy GP4 or would be covered by a specific historic environment policy. Please amend the policy accordingly. Policy GP4 clause &quot;f&quot; refers to historic environment. Policies are considered together and therefore the assertion is incorrect.</td>
</tr>
<tr>
<td>90818618</td>
<td>Farah Chaudry (received via email) , Team Leader, Norfolk &amp; Suffolk, Natural England</td>
<td>-</td>
<td>We are pleased to see that preference will be given to restoration proposals that incorporate a net gain for biodiversity primarily through the creation or enhancement of Priority Habitats and linkages to local ecological networks. Noted.</td>
</tr>
</tbody>
</table>

**Policy MP7: Aftercare**
As noted in our previous comments, the policy made no reference to how aftercare should be used to mitigate the impact on the historic environment (The Framework, paragraph 143 (bullet point 8)). These criteria should be specific to aftercare and are not covered by policy GP4 or would be covered by a strategic historic environment policy. Please amend the policy accordingly. Policy GP4 clause “f” refers to historic environment. Policies are considered together and therefore the assertion is incorrect.

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<tr>
<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td></td>
<td></td>
<td></td>
<td>As noted in our previous comments, the policy made no reference to how aftercare should be used to mitigate the impact on the historic environment (The Framework, paragraph 143 (bullet point 8)). These criteria should be specific to aftercare and are not covered by policy GP4 or would be covered by a strategic historic environment policy. Please amend the policy accordingly. Policy GP4 clause “f” refers to historic environment. Policies are considered together and therefore the assertion is incorrect.</td>
<td></td>
</tr>
<tr>
<td>90706454</td>
<td>Mr Simon Loftus</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>-</td>
<td>Noted.</td>
</tr>
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**Policy MP8: Concrete Batching and Asphalt Plants**  
No comments received

**Policy MP9: Safeguarding of Port and Rail Facilities, and Facilities for the Manufacture of Concrete and Asphalt**

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<tr>
<td>89424292</td>
<td>Mr Philip Dash (received via email), Senior Planner, Essex County Council</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>The need to safeguard those facilities identified in the policy is agreed. However, the implementation of the policy would be aided by prescribing the types of development that trigger the safeguarding provisions. The current policy wording states that ‘District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the 250 metre safeguarding zones’. Through the current policy wording it seems as though the decision as to whether a proposal conflicts with mineral interests could be taken subjectively by the local planning authority. In order to ensure an unambiguous approach it may be more appropriate to define the development types that would be in and out of scope of this policy at the outset. This then requires that the County Council is consulted on To ensure SCC is consulted on all developments within the 250m safeguarding the policy could be modified to remove the words &quot;potentially conflicting&quot;. This would help to make the policy more effective as it would be the County Council (as minerals planning authority) determining if a proposal conflicts with the uses listed within the policy, rather than the allowing the local planning authority to make this determination. The last paragraph (which refers to policy MP9) is describing how the policy will work in practice. The purpose of policy MP9 is in the plan to guide how safeguarding implications will be assessed and how</td>
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all developments of the appropriate type and the M&WPA can determine whether the proposed development would conflict with mineral interests or not. The policy further states that ‘The County Council will then refer to Policies MP9 before providing a consultation response’. It is unclear how reference to this policy (singular) will aid in coming to a decision as to whether there are safeguarding implications. Reference should be made to the relevant LPA planning application information. It is worth noting that the NPPF review may provide policy where a (minerals or waste facility) has effects that could be deemed a statutory nuisance in the light of new development in its vicinity (including changes of use). Proposed amendments suggest that the applicant (or ‘agent of change’) should be required to secure suitable mitigation before the development has been completed.

90540628 Mrs Sarah Barker, Senior Planning Officer, Ipswich Borough Council - No - The Policy MP9 - Safeguarding of port and rail facilities, and facilities for the manufacture of concrete, asphalt and recycled materials

The policy MP9 and the supporting text deals with the protection of sites for the manufacture of concrete, asphalt and recycled materials. The Borough Council is supportive of the policy, but raises objection to the effect of the Policy on its earlier submission at Preferred Options stage concerning the Concrete Batching Plant (CB5), Sir Alf Ramsey Way, Ipswich. In the earlier submission the Council suggested relocation for site CB5 as follows – “this site is a ready mix concrete plant; given that it relies on aggregates, this site should be encouraged to relocate to the port area.”

(Note: The Council has also made a related submission concerning the Household Waste Recycling Centre, HWRC6, on nearby land and which the Council believes should be jointly planned in a comprehensive manner and a separate submission is made in that respect.)

In the absence of there being some recognition of the Council’s ambition to upgrade this part of the river front in Ipswich, The Council has agreed to submit an objection, as follows:

The submission draft plan does not address the concerns raised at Preferred Options stage and the Pre-Submission Draft continues to safeguard HWRC6 and CB5 at

SCC will respond to these implications

Comment on the "agent of change" is noted however part of the policy states "Any mitigation required falls on the development that receives planning permission last", which would have the same effect as the agent of change principle.

The NPPF requires Minerals Planning Authorities to safeguard existing minerals facilities, and the NPPW that proposals for non-waste development should take into account potential impacts upon waste facilities. However, Policy MP9 and Policy WP18 are written to enable alternative provision to be made should alternative development of the land be considered. SCC would welcome discussions with Ipswich Borough Council as housing plans progress to enable growth and ensure any necessary reprovision of minerals and waste infrastructure, on suitable sites.
Portman’s Walk/Sir Alf Ramsey Way in Ipswich. The Borough boundary is drawn very tightly and the partner authorities within the Ipswich Housing Market Area will expect Ipswich Borough Council to explore all redevelopment opportunities that may exist within the core of the town to meet the Borough’s housing need. The site opposite, Bus depot, Sir Alf Ramsey Way/West End Road, is already a mixed use allocation through the adopted Ipswich Local Plan, 2017 (IP004). The two sites safeguarded by the M&W plan – HWRC6 and CB5 – may represent important opportunities for residential development during the Ipswich Local Plan period to 2036. The Borough Council would welcome the opportunity to plan positively with Suffolk County Council for the relocation of these facilities and subsequent re-use of the land for housing.

Alteration suggested:
Add within the MP9 policy box an additional clause… The County Council will accept development proposals on safeguarded sites where they have been promoted through a local plan process and an alternative facility has been provided.

| 90616219 | Mr Chris Hemmingsley (received via email), Senior Planning Manager, Brett Group | - | - | Policy MP9
We very much welcome policy MP9 (formally MP10) in the recognition of safeguarding for port, rail, concrete, asphalt and recycled materials facilities both in terms of development pressures on these safeguarded sites but also from direct/indirect impact from existing and proposed surrounding land uses. Brett also welcome the revised text which seeks to clarify that the onus of mitigation when development takes place within the vicinity of a safeguarded minerals related facility (as defined) is on the developer, not the operator of the site. | Noted. |

| 90627302 | Natalie Beal (received via email), Planning Policy Officer, | - | - | • Policy MP9. Not sure what is meant by “any mitigation required falls on the development that receives planning permission last”. Should the mitigation be instated by whoever implements their permission, whether their permission was given most recently or a year ago? If a The intention of this policy is to ensure that the operation of existing or permitted minerals developments are not then prejudiced by other development that comes forward in the vicinity of the minerals operation. In the scenario where planning |
| The Broads Authority | development is proposed over an area which is likely to be parcelled up / split into phases / uses then an outline scheme of mitigation and implementation programme which identifies the measures for each phase/area should be provided by the first applicant and implemented / amended accordingly by them or following phases. Wording is not clear. | permission for housing was granted after a minerals facility was permitted, but not implemented, the housing would be required to provide the mitigation to address issues arising from a minerals facility and housing being in close proximity to one another. It would not be practical for the site which is implemented last, as this could require changing planning permissions that are already granted. |
| 90731458 | Mr Mark North (received via email) , Director of Planning Aggregates and Production, Minerals Product Association (MPA) | Safeguarding of port and rail facilities, and facilities for the manufacture of concrete and asphalt and recycled materials. We welcome the fact that SCC have identified the requirement to have a separate safeguarding policy for the above facilities and have gone some way to taking on board our comments made on the Preferred Options draft of October 2017. However, as currently drafted we do not believe the policy is fully effective. Firstly, the sites to be safeguarded should be listed as well as being identified on the Safeguarding Maps. Secondly inappropriate development in the proximity of safeguarded should be dealt with in a more explicit way in the policy as this can also have the effect of frustrating the operation of the safeguarded site/operation. In addition to buffer zones the principle of agent of change should be considered as recently advocated in the London Plan and in the proposed revision of NPPF as follows; • The Agent of Change principle places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. • Reflecting the Agent of Change principle to ensure measures do not add unduly to the costs and administrative burdens on existing noise-generating uses It is suggested that the policy is redrafted as follows; Proposed Changes (deletions in strikethrough; new text in bold) Policy MP9 When proposals are made which would result in the loss of or might potentially compromise the use of Minerals ancillary infrastructure sites identified on the Policies Map, with a 250m buffer zone, will be safeguarded against development which would The sites are listed in appendix 3 of the plan as well as being mapped. SCC considers the policy is explicit on how the Council will treat planning proposals within proximity to safeguarded sites. In the policy the onus is placed on those making proposals within the vicinity of existing minerals facilities, to either demonstrate that the facilities are not needed, can be relocated, or that the proposed development does not unduly impact on the minerals facility. |
**Prevent or frustrate the use of the site for minerals ancillary infrastructure purposes such as:**

a) an existing, planned or potential rail head, wharf or associated storage, handling or processing facilities for the bulk transport by rail or sea of minerals, including recycled, secondary and marine-dredged materials, and/or;

b) an existing, planned or potential site for concrete batching, the manufacture of coated materials, other concrete products or the handling, processing and distribution of substitute, recycled and secondary aggregate material; applicants will be required to demonstrate to the County Council that those sites no longer meet the needs of the aggregates industry. Where this is not the case, satisfactory alternative handling facilities should be made available by the developer.

Development proposals in close proximity to the above minerals related facilities should demonstrate that they would not prejudice or be prejudiced by those facilities.

Where development is proposed within an identified buffer zone the ‘Agent of Change Principle’ will be applied in that the responsibility, and cost for mitigating impacts from existing noise-generating activities or uses will be placed on the proposed new noise-sensitive development and any such measures will not add to the costs and administrative burdens on existing noise generating uses.

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<th>90819480</th>
<th>Mr Philip Rowell (received via email), Director, Adams Hendry</th>
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The submission draft local plan, through policies MP9 and WP18, seeks to safeguard the following specific sites within the statutory Ports of Lowestoft and Ipswich for particular minerals and waste purposes, namely:

Port of Ipswich

The National Planning Policy Framework in paragraph 143 is clear that minerals planning authorities should set out policies which safeguard existing, planned and potential wharfs and associated storage, as well as existing and planned concrete batching plants, facilities creating coated materials, other concrete products, and secondary recycled aggregate plant. To not
Consulting Limited  
(for Associated British Ports)

- Cliff Quay (Site ref W1 and AP3 – Wharf and Asphalt Plant);
- West Bank Waste Transfer Station (Site Ref WTF4 – Waste Transfer Station); and
- West Bank Terminal (Site ref W4 and R4 – Wharf and Rail Head).

Port of Lowestoft
- Hamilton Dock (Site W2 – Wharf), and
- North Quay (Site W3 – Wharf)

This is an unsound position, for the reasons now summarised.

The two Ports of Lowestoft and Ipswich are owned and operated by Associated British Ports (ABP). For the purposes of planning matters, ABP is a statutory undertaker (as defined in section 262 of the Town and Country Planning Act 1990) and the port land owned by ABP constitutes operational land of a statutory undertaker (as defined in section 263 and 264 of the 1990 Act). As such, the two ports benefit from extensive permitted development rights that enable port operations to react to the needs of the market in an efficient and timely way. The Ports are, therefore, dynamic – and often fast changing – land uses.

The Ports need to be able to react to the needs of the market in this way – and, therefore, rely upon their extensive permitted development rights - because of the nature of the industry within which they operate. This is best explained by having regard to the Government’s policy for ports, which is contained in the National Policy Statement for Ports (DfT, 2012) (NPSfP) (a national policy document to which the Local Plan should have regard).

Amongst other things, the NPSfP makes it clear that it is Government policy to “allow judgements about when and where new developments might be proposed to be made on the basis of commercial factors by the port industry or port developers operating within a free market environment” (paragraph 3.3.1). This position – which is a continuation of the ‘market led’ ports policy position which include these policies would make the plan unsound as they would not align with national planning policy. Additionally National Planning Practice Guidance states that these site should be safeguarded in order to ensure that sites are available should they be needed.

It is noted that these issues were not raised during the previous stages of consultation and that previous to that discussions with ABP indicated that these sites were accurate.
has been in place for some time – is further emphasised in the context of the policy identifying that an element of overall need for port infrastructure is that capacity is provided in the right place. In respect of this matter the NPSIP highlights that it is not for public bodies such as Government to dictate where port development and capacity should be provided (paragraph 3.4.12).

In terms of the need for capacity and development, the NPSIP makes it clear that this depends not only on demand, but also on the need to retain flexibility that ensure that port capacity is located where it is required, and on the need to ensure effective competition and resilience in port operations.

In addition to the policy context within which the Ports of Lowestoft and Ipswich function, it is also necessary to understand the legislative context. In addition to being a statutory undertaker, ABP is also the statutory harbour authority for the two Ports and has to operate the two ports in accordance with both general and port specific legislation. Of note is that both ports are required to operate in accordance with an aspect of legislation commonly known as the ‘open port duty’.

This duty is founded in section 33 of the Harbours, Docks and Piers Clauses Act of 1847, which states:

“Upon payment of the rates made payable by this and the special Act, and subject to the other provisions thereof, the harbour, dock, and pier shall be open to all persons for the shipping and unshipping of goods, and the embarking and landing of passengers.”

In simple terms, the duty is one that provided that the trade is legal and the necessary rates and dues are paid, the two Ports must be open to all for the shipping and unshipping of goods and the movement of passengers.

Against this – albeit very brief – background summary, it is clear that it is unsound for the Council through the emerging Minerals and Waste plan to seek to safeguard land and facilities within these Ports for a particular minerals or
waste related trade or use, whilst those sites form and remain part of a statutory port estate.

Such safeguarding could only be said to be sound in circumstances where the sites in question were to be sold off or somehow made available by ABP for non-port / port related development. ABP has no intentions to take such steps in respect of the sites in question or any other parts of the statutory Lowestoft and Ipswich port estates.

Having said this, however, ABP wishes to make it clear that its concern over the potential safeguarding of sites within its operational port areas does not mean that it is saying the sites in question are necessarily unsuitable for minerals and waste purposes. For example, in respect of Wharf Site W3 within the Inner Harbour area of the Port of Lowestoft, ABP is currently giving active considerations – along with potential customers – to its use for the import of aggregate, a use for which ABP consider there to be a clear demand. However, conversely, there is no prospect – currently or in the foreseeable future - of wharf site W2 within the Port of Lowestoft being used for a minerals or waste purpose as this is in use for an alternative port related purpose.

Having regard to the fact, therefore, that some sites within the two ports may well be used for minerals and waste purposes during the plan period, ABP does welcome and support the aspect of policy MP9 which seeks to ensure that the use of existing or potential sites and facilities – including those existing or potential sites within the two ports - is not adversely impacted upon by other development proposals occurring in proximity to them. ABP further supports the requirement set out in policy MP9 that necessary mitigation - in the form of satisfactory alternative facilities – should be made available by those promoting the development causing the adverse impacts for the handling facility. However, in respect of existing or potential sites and facilities within the operational ports, the protection / mitigation requirements set out in the policy can clearly only be applied in respect of third party non-port developments outside of the port area – and, for the reasons set out, clearly not other port related developments within the port area - or in circumstances where ABP was
to somehow dispose of the site in question or make it available to non-port / port related use.

Policy MP9 needs to be amended along the following suggested lines. Additional text is shown in bold italicised text and deleted text is shown crossed through.

‘Policy MP9: Safeguarding of port and rail facilities, and facilities for the manufacture of concrete, asphalt and recycled materials

When proposals are made which would result in the loss of or might potentially compromise the use of:

a) an existing, planned or potential rail head, wharf or associated storage, handling or processing facilities for the bulk transport by rail or sea of minerals, including recycled, secondary and marine-dredged materials, that is not located on operational port land and/or;
b) an existing, planned or potential site for concrete batching, the manufacture of coated materials, other concrete products or the handling, processing and distribution of substitute, recycled and secondary aggregate material that is not located on operational port land;

applicants will be required to demonstrate to the County Council that those sites no longer meet the needs of the aggregates industry. Where this is not the case, satisfactory alternative handling facilities should be made available by the developer. Development proposals in close proximity to the above minerals related facilities should demonstrate that they would not prejudice or be prejudiced by those facilities.

In respect of facilities or potential facilities located on operational port land, the requirements in the preceding paragraphs will only apply in circumstances where:

(i) an existing or potential facility on operational port land is potentially impacted upon by a third party non-port related development; and/or
(ii) where the statutory port authority sells off the site in question or makes it available for non-port and port related development.
Any mitigation required falls on the development that receives planning permission last.

District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the 250 metre safeguarding zones as defined in the Appendix 3 Safeguarding Maps. The County Council will then refer to Policies MP9 before providing a consultation response.

To assist the reader of the Plan, it is also suggested that a paragraph of explanatory text is added after paragraph 5.44 to explain the position further. Wording along the following lines is suggested:

‘5.44 Some facilities of relevance to policy MP9 are located within the statutory Ports of Ipswich and Lowestoft. Having regard to both the national policy of relevance to ports – currently contained within the National Policy Statement for Ports – and the legislative framework within which these ports have to operate it is not possible to safeguard facilities or sites within the ports for a particular minerals or waste use in the same way as it is on other sites. Policy MP9 makes this distinction in respect of the circumstances in which the policy requirements will be applied.’

Finally, and again to assist the reader of the Plan, it is suggested that the sites located on operational port land are distinguished in the list of safeguarded sites provided at Appendix 3 of the Plan. In this way, the reader of the plan can understand which sites the different provisions of policy MP9 apply. It is also necessary for the relevant insets to the policies map (Maps W1 and I1) to distinguish these sites from the others shown.

However, site W2 should be deleted from plan W1 as this area, within the Port of Lowestoft operational area, is in active use for other port related activities and there is no prospect - currently or in the foreseeable future – of this site being used for a minerals or waste related purpose.
**POLICY MP10: MINERALS CONSULTATION AND SAFEGUARD AREAS**

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<tr>
<td>89424292</td>
<td>Mr Philip Dash (received via email), Senior Planner, Essex County Council</td>
<td>-</td>
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<td>-</td>
<td>Regarding part a: The Policy states that “The County Council will, when consulted by the Local Planning Authority, object to such development unless it can be shown that the sand and gravel present is not of economic value, or not practically or environmentally feasible to extract, or that the mineral will be worked before the development takes place”. The implementation of this policy will be greatly assisted by clarifying in supporting text how developers will be expected to demonstrate the economic viability, or otherwise, of prior extraction. Regarding part b: The current policy wording states that ‘District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within 250m of an existing, planned or potential site allocated in the Plan for sand and gravel extraction’. Through the current policy wording it seems as though the decision as to whether a proposal conflicts with mineral interests is to be taken by the local planning authority. In order to ensure a uniform approach it is considered more appropriate to define the development types that would be in and out of scope of this policy at the outset. This then requires that the County Council is consulted on all developments of the appropriate type and then the M&amp;WPA can take the decision as to whether they would conflict with mineral interests or not. Regarding the final paragraph: A proposal cannot ‘conflict’ with a Mineral Safeguarding Area. It would be more accurate to state that ‘when a non-minerals or waste development proposal is received where Sha or more falls within the Mineral Safeguarding Area, District and Borough Councils should consult the...”</td>
<td>Regarding part a. It is assumed that developers are capable of working out what is required. To clarify this further SCC wishes to amend the first sentence by removing the words “which is not in accordance with the Development Plan” and adding the words “or used within the development” to the end of the last sentence. Regarding part b. It is assumed that the Local Planning Authority is able to make a sound judgement whether or not to consult the County Council. The last paragraph (which refers to policy MP10) is describing how the policy will work in practice. The purpose of policy MP10 is in the plan to guide how safeguarding implications will be assessed and how SCC will respond to these implications.</td>
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County Council'. It is already established through the emerging policy that the County Council will be consulted on all proposals within the Mineral Safeguarded Area that are over 5 hectares and so the test as to whether the County Council is consulted or not is one based on the area of the application site and not one of potential conflict.

The policy further states that 'The County Council will then refer to Policies MP10 before providing a consultation response'. It is unclear how reference to this policy (singular) will aid in coming to a decision as to whether there are safeguarding implications. Reference should be made to the relevant LPA planning application information.

In relation to the above comments on the Agent of Change principle it is suggested that additional wording is added to the end of Policy MP10:

**Proposed Additions** (deletions in *strikethrough*; new text in **bold**)

*Policy MP10*

Where development is proposed within an identified buffer zone the ‘Agent of Change Principle’ will be applied in that the responsibility, and cost for mitigating impacts from existing noise-generating activities or uses will be placed on the proposed new noise-sensitive development and any such measures will not add to the costs and administrative burdens on existing noise generating uses.

SCC proposes similar wording to Policy MP9 “Any mitigation required falls on the development that receives planning permission last.”

The Council considers that Policy MP10 is not particularly clear. It is the Council’s understanding that the Minerals Safeguarding Area is the same as the Minerals Consultation Area. However, the way that point (a) of the policy is worded suggests that Minerals Safeguarding Areas are there own specific area within a wider Minerals Consultation Area.

It is not correct to say that MCAs/MSAs are contiguous as explained in paragraph 5.45. SCC wishes to change the reference in the last paragraph from MSA to MCA.
To add to the confusion the final paragraph states that District Council’s should consult the County Council on proposals falling within the Minerals Safeguarding Area as defined on the Proposals Map. However, the term ‘Minerals Safeguarding Area’ is not specifically acknowledged in the key to the proposals map.

It should also be noted the term ‘Proposals Map’ is now changed to ‘Policies Map’ in the Town and Country Planning (Local Planning) Regulations 2012.

The supporting text should include the following sentence from the existing Minerals Core Strategy:

“In Suffolk Mineral Consultation Areas (MCAs) are based entirely on (i.e. contiguous with) Mineral Safeguarding Areas”

The supporting text should also state: “Mineral Consultation Areas/Mineral Safeguarding Areas are shown on the Policies Map” The policy should be amended to state:

(a) those Minerals Safeguarding Areas located within the Minerals Consultation Areas identified on the Proposals Policies Map from proposed development in excess of five hectares which is not in accordance with the Development Plan. District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the Minerals Safeguarding Area/Minerals Consultation Area as defined on the Policies Map.

The key to the Policies Map should be revised to state “Minerals Safeguarding Area/Minerals Consultation Area”

7. **WASTE POLICIES**

*Policy WP1: MANAGEMENT OF WASTE (Mt)*
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<tr>
<td>89424292</td>
<td>Mr Philip Dash (received via email), Senior Planner, Essex County Council</td>
<td>-</td>
<td>-</td>
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<td>It is unclear why the amount of waste arising in the administrative area is a policy, which also states that ‘appropriate waste management facilities will be granted planning permission’ when paragraph 6.7 Clause a) states that ‘there is no identified shortfall in waste management facilities at the present time’. Please see above request for clarification of paragraph 6.7 Clause a). If any waste capacity gap over the plan period is identified, Policy WP1 should explicitly confirm this. Paragraph 6.7 Clause a) should be clarified with regard to whether there is no identified shortfall in waste management at the present time only, or whether this also applies to forecasted capacity requirements across all waste streams to the end of the Plan period. It would be useful to clarify in clauses g) and h) that whilst sites are not being actively sought or planned for with regard to these waste streams, criteria exist by which such facility types could come forward should the market wish to bring them forward.</td>
<td>Paragraph 6.7 point a) is clear in that it indicates that there is no identified shortfall in waste management facilities at the present time. Policy WP1 indicates that the predicted levels of the various waste streams will increase or decrease over time. Applications for waste management facilities will no doubt be submitted during the course of the plan period. Policy WP1 provides guidance as to what level of waste would need to be catered for in respect of purely Suffolks needs. In respect of paragraph 6.7 points g) and h) there is a full suite of policies to cover many types of waste management facilities.</td>
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**Policy WP2: Proposed site for radioactive waste management**

No comments received.
**POLICY WP3: EXISTING OR DESIGNATED LAND USES POTENTIALLY SUITABLE FOR WASTE DEVELOPMENT**

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<tr>
<td>90776063</td>
<td>Mr Stewart Patience (received via email), Spatial Planning Manager, Anglian Water</td>
<td>-</td>
<td>No</td>
<td>-</td>
<td>Policy WLP3: Existing or designated land-uses potentially suitable for waste development – Unsound, justified (relevant test) Reference is made to waste management uses on wastewater management sites being limited to composting and anaerobic digestion. Anglian Water as sewerage undertaker is concerned that this is not justified in that there may be other waste management uses which would be suitable at water recycling centres dependant upon both scale and location. It is therefore suggested that the above wording is removed or amended to allow for other waste management uses. It is therefore proposed that criterion h of Policy WLP3 be amended as follows: 'h) waste water treatment facilities (composting and anaerobic digestion only)';</td>
<td>Composting and anaerobic digestion can be ancillary to the operation of waste water treatment facilities. There are currently no waste water treatment plants with another waste use in Suffolk. The majority of waste water treatment plants in Suffolk are small facilities in the country side where a significant waste development might not be acceptable.</td>
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<tr>
<td>89503647</td>
<td>Corinne Meakins (received via email), Local Partnership Advisor, Forestry Commission East and East Midlands</td>
<td>-</td>
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<td>-</td>
<td>Our second point relates to WP3 namely e) agricultural and forestry land (open air composting only);  We suggest that there needs to be greater clarification here, that Ancient and Semi Natural Woodland (not all of which is designated SSSI) is not suitable for use as sites for composting and indeed would be a net loss to the environment, see Government’s 25 year Plan <a href="https://www.gov.uk/government/publications/25-year-environment-plan">https://www.gov.uk/government/publications/25-year-environment-plan</a> we would expect significant compensatory plantings were any such deforestation proposed. This sentence just needs the words in brackets at the end (not Ancient woodland or PAWS)</td>
<td>Agree. Amend e) to read agricultural and forestry land (open air composting only) excluding ancient woodland or planted ancient woodland sites.</td>
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**Policy WP4: Household Waste Recycling Centres**

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| 90540628         | Mrs Sarah Barker, Senior Planning Officer, Ipswich Borough Council | No |        |                                    | Aim 3 and Objective 8 Para 6.12 and Policy WP4 - Household waste recycling centres  
The Council supports the terms of the Policy WP4 as worded because it provides for the identification of alternative HWRCs. However, as identified in the related matter of Concrete Batching Plant (CB5), Sir Alf Ramsey Way, Ipswich the Council objects to the safeguarding of the site HWRC6 for the reasons identified in the Preferred Options stage.  
'It is acknowledged that there are limited existing waste related sites in Ipswich Borough Council administrative area. However, the Council has for a number of years supported the relocation of the Sir Alf Ramsey Way/West End Road recycling plant. As you are no doubt aware, the Borough is not able to accommodate sufficient residential allocations within its boundaries to meet its housing need. This site has been championed as a potential housing site for a number of years and little progress has been made. For example, it was previously identified as a potential development site in the 2007 IP-One Area Action Plan Preferred Options. It would be useful if this ambition could be positively supported by the county as it is not located in an area suitable for such a use in the short to medium term.’  
(Note: The Council has also made a related submission concerning the Household Waste Recycling Centre on nearby land and which the Council believes should be jointly planned in a comprehensive manner and a separate submission is made in that respect.)  
In the absence of there being some recognition of the Council’s ambition to upgrade this part of the river front in Ipswich, The Council has agreed to submit an objection as follows:  
The submission draft plan does not address the concerns raised at Preferred Options stage and the | The NPPF requires Minerals Planning Authorities to safeguard existing minerals facilities, and the NPPW that proposals for non-waste development should take into account potential impacts upon waste facilities. However, Policy MP9 and Policy WP18 are written to enable alternative provision to be made should alternative development of the land be considered.  
SCC would welcome discussions with Ipswich Borough Council as housing plans progress to enable growth and ensure any necessary reprovision of minerals and waste infrastructure, on suitable sites. It is not considered necessary to amend the policy as currently drafted. |
Submission Draft continues to safeguard HWRC6 and CB5 at Portman's Walk/Sir Alf Ramsey Way in Ipswich. The Borough boundary is drawn very tightly and the partner authorities within the Ipswich Housing Market Area will expect Ipswich Borough Council to explore all redevelopment opportunities that may exist within the core of the town to meet the Borough’s housing need. The site opposite, Bus Depot, Sir Alf Ramsey Way/West End Road, is already a mixed use allocation through the adopted Ipswich Local Plan, 2017 (IP004) The two sites safeguarded by the M&W plan – HWRC6 and CB5 – may represent important opportunities for residential development during the Ipswich Local Plan period to 2036. The Borough Council would welcome the opportunity to plan positively with Suffolk County Council for the relocation of these facilities and subsequent re-use of the land for housing. As this site might also be subject to the safeguard of Policy WP18 a separate objection is submitted but could be read in conjunction with the above. Add within the WP4 policy box an additional clause… The County Council will accept development proposals on safeguarded sites where they have been promoted through a local plan process and an alternative facility has been provided. Alternatively, an amendment to Para 6.12 may be sufficient … HWRC will be safeguarded by the terms of WP18 unless their re-use has been promoted and an alternative facility provided as part of a Local Plan process.

90627302 Natalie Beal (received via email), Planning Policy Officer, The Broads Authority

- - - • WP4 – Should these be located near to areas that generate waste i.e towns? What does ‘accessible to the public’ mean? These sites are designed for household waste so need to be accessed by the public anyway. We raised this as part of the last consultation.

These sites should be located near areas which generate waste and SCC consider this is covered by the policy GP3 and the key diagram, which shows urban areas.
**Policy WP6: In-Vessel Composting Facilities**  
No comments received.

**Policy WP7: Anaerobic Digestion**  
No Comments received.

**Policy WP8: Proposals or Transfer of Inert and Construction, Demolition and Excavation Waste**

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<tbody>
<tr>
<td>89424292</td>
<td>Mr Philip Dash (received via email), Senior Planner, Essex County Council</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Where the policy states “On land suitable for General Industrial or Storage &amp; Distribution uses, activities shall take place within purpose-designed facilities”, it is considered useful to include the appropriate Use Class Order codes.</td>
<td>SCC would accept modification to include specific Use Class codes for the uses listed in the policy i.e B2 and B8.</td>
</tr>
<tr>
<td>90612426</td>
<td>Mr Peter Orrock (received via email), Mineral Services LTD</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>I note that the Preferred Options Draft Policy MP5 Recycled Aggregates is now included within Policy WP8. However, the former Policy MPS wording whereby the County Council ‘encourages temporary aggregates recycling facilities at minerals and landfill sites and encourage the siting of permanent recycling facilities near to the source of raw material .. etc’ has not been carried into WP8. May I suggest that these words are added into WP8 and not as in the case in the Submission Draft simply deleted after two rounds of consultation? I further note that the following sentence has been added ‘At mineral sites, planning permission will be limited to the life of a mineral operation’. May I suggest that suitable words to achieve more flexibility in Policy WPS would be prudent in order to allow for the retention of ‘recycling or transfer of inert and construction, demolition and excavation waste’ facilities</td>
<td>The existing wording already allows for temporary recycling facilities at minerals sites. SCC does not agree that these should be able to remain after minerals extraction is completed, as this would delay restoration of the site.</td>
</tr>
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</table>
beyond the expiration of the mineral extraction consent, provided that appropriate planning consents and conditions are met. Former quarries can provide suitable connections to the road network, hard surfaced areas, connections to energy supplies etc, without the need to duplicate such facilities elsewhere.

| 90616219 | Mr Chris Hemmingsley (received via email), Senior Planning Manager, Brett Group | - | - | WP6 | It is noted that the previous Policy MP5 (Recycled Aggregates) is now contained within Policy WP8. Whilst generally supportive of Policy WP8, and understanding of SCC’s response to our previous consultation requesting that subsidiary activities (such as recycling or asphalt plant) may be retained past the life of a minerals site. We continue to have concerns in regard to the second paragraph that states ‘At mineral sites, planning permission will be limited to the life of the mineral operation’. We would very much like see more flexibility in the policy so as to not preclude the retention of such facilities post landfilling should it be demonstrable that this site remains the most practicable, viable and suitable location for such ongoing working subject to planning consent tests and process as required. Further, we note that the former Policy MP5 wording whereby the County Council ‘encourages temporary aggregates recycling facilities at minerals and landfill sites and encourage the siting of permanent recycling facilities near to the source of raw material….etc’ has not been carried into WP8. We would request that these words are re-inserted into Policy WP8.

SCC still consider that aggregate recycling facilities tied to the life of a minerals extraction or landfill site, should be tied to the life of these sites, otherwise they would constitute permanent development in the countryside. They are considered acceptable alongside minerals extraction and landfill in the countryside, because these uses are temporary, however continuing aggregate recycling after mineral extraction or landfill activities have stopped would prevent the final restoration of these sites.

The wording "siting of permanent recycling facilities near to the source of raw material" was removed as whether or not a permanent aggregate recycling facility is well located would be judged against policies GP1: presumption in favour of sustainable development and GP3: Spatial Strategy. The Plans key diagram indicates the location of urban areas, (which is likely where material for recycling is likely to arise, due to demolition activity) and key transport routes, so the principle of locating aggregate recycling facilities near to sources of raw materials is still present within the plan.

**Policy WP9: Waste Transfer Stations, Materials Recycling Facilities**

No comments received
### POLICY WP10: RESIDUAL WASTE TREATMENT FACILITIES

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<tr>
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<tbody>
<tr>
<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>We have noticed some typographical errors in these paragraphs</td>
<td>Noted.</td>
</tr>
</tbody>
</table>

### POLICY WP11: APPROVAL OF SITES FOR DISPOSAL OF INERT WASTE BY LANDFILLING OR LANDRAISING

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<th>Representation</th>
<th>SCC Response</th>
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</thead>
<tbody>
<tr>
<td>90616219</td>
<td>Mr Chris Hemmingsley (received via email), Senior Planning Manager, Brett Group</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>We acknowledge the changes made to Policy WP11, and note the change to make options a) and b) alternatives by the introduction of the word 'or'. However we remain concerned about the implications of section c) on the ability to deliver a) or b) particularly if required for a suitable restoration of a minerals scheme in terms of finding viable types and quantities of infill material.</td>
<td>SCC consider it appropriate to include part &quot;c&quot; of the policy as the National Planning Policy for Waste states in paragraph 3 that &quot;in preparing local plans, waste planning authorities should… drive waste management up the waste hierarchy&quot;</td>
</tr>
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</table>
### POLICY WP12: DISPOSAL OF NON-HAZARDOUS OF HAZARDOUS WASTE BY LANDFILLING OR LANDRAISING

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<tr>
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</thead>
<tbody>
<tr>
<td>90765405</td>
<td>Miss Charlie Christensen, Planning Advisor, Environment Agency</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>This Policy could be enhanced by including reference here that non-hazardous and inert landfill will need to be assessed with reference to our Groundwater Protection documents, particularly Position Statement E1 that address location.</td>
<td>Policy GP4 part &quot;m&quot; is intended to cover all parts of the local water environment, including groundwater.</td>
</tr>
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### POLICY WP13: MINING LANDFILLING OR EXCAVATING OF WASTE

No comment received

### POLICY WP14: WASTE WATER TREATMENT FACILITIES

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<tr>
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</thead>
<tbody>
<tr>
<td>89424292</td>
<td>Mr Philip Dash (received via email), Senior Planner, Essex County Council</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Please note that all references to Waste Water Treatment Facilities should be changed to Water Recycling Centres to reflect current practice.</td>
<td>It is noted that Anglian Water prefers the term “Water Recycling Centres” to Waste Water Treatment Facilities” and references shall be changed throughout the Plan.</td>
</tr>
<tr>
<td>90776063</td>
<td>Mr Stewart Patience (received via email)</td>
<td>-</td>
<td>No</td>
<td>-</td>
<td><strong>Policy WP14: Waste water treatment facilities – Unsound, effective, consistent with national policy (relevant tests)</strong></td>
<td>SCC would accept the proposed modifications to change the policy. It is also noted that Anglian Water prefers the term “Water Recycling**</td>
</tr>
</tbody>
</table>
Anglian Water has a statutory obligation to provide sufficient sewage treatment capacity so that we can continue to serve the needs of our existing or new customers. Where an upgrade or improvements are required at an existing water recycling centre (formerly wastewater treatment works) it is identified and funded through our business planning process.

It is considered that Policy WLP14 as currently drafted is not sufficiently positive in enabling the continued operation and development of existing water recycling centres to enable Anglian Water to fulfill our statutory obligations under the Water Industry Act 1991. The policy refers to both new waste water treatment facilities and the extension of existing waste water treatment facilities. However there may be circumstances in which improvements are required to an existing site without the need to extend existing site or build a new site. It is therefore suggested that the policy should also refer to improvements to existing sites to accommodate further growth or where required for operational reasons as well as supporting infrastructure e.g. renewables.

Similarly it is assumed that all proposals will be related to discharge into water bodies and water quality. This will not be the case for all proposals and Policy WLP14 should be amended to make this clear.

In addition the policy should set out the circumstances in which proposals are likely to be supported (where they meet the specified criteria). As drafted Policy WLP14 is not a positive policy which would allow proposals to come forward to accommodate growth and for operational reasons where it meets the specified criteria.

It is therefore proposed that Policy WLP4 be amended as follows:

‘Proposals relating to the role, function and operation of water recycling centres including the provision of additional sewage treatment capacity and supporting infrastructure (including renewable energy) will be supported in principle particularly where it is required to meet the wider growth proposals identified in the Development Plan.’
New or extended waste water treatment facilities, water recycling centres may be acceptable is will be supported where such proposals aim to improve the quality of discharged water or reduce the environmental impact of operation. The developer will be required to demonstrate that the proposal can be located without giving rise to unacceptable environmental impacts. Proposals must also comply with the environmental criteria set out in Policy GP4.

**Policy WP15: Transfer, Storage, Processing & Treatment of Hazardous Waste**

No comment received.

**Policy WP16: Treatment and Storage of Radioactive Waste at Sizewell Nuclear Power Station**

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</table>
| 90747104 (other part of representation and response under Policy WS1) | Mr Owain Griffiths (received via email), Director of Planning Development & Regeneration, GVA Grimlet Ltd | - | - | - | [https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/Individual-Reps/G/GVA-Grimlet-Ltd-90747104.pdf](https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/Individual-Reps/G/GVA-Grimlet-Ltd-90747104.pdf) | WP16 paras 1 and 2 - SCC sees this part of the policy as enabling the Nuclear Decommissioning Authority (NDA) Strategy. The “Our Strategy” section on page 59 of the NDA Strategy, under the 5th bullet point it states that one of the key principles of integrated waste management is to seek “opportunities to share treatment and interim storage facilities”, which is what WP16 policy seeks to achieve. Additionally SCC do not want to include disposal of radioactive waste on the site as this is not the current strategy for the decommissioning of Sizewell A, and does not align with the preference of moving waste up the waste hierarchy as possible. WP16 a - Add additional explanatory text “The Energy Act (2004) requires the Nuclear Decommissioning Authority (NDA) to review and publish its strategy every 5 years. The can be viewed on the NDA website by following the link provided below: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/518669/Nuclear_Decommissioning_Authority_Strategy_effective_from_April_2016.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/518669/Nuclear_Decommissioning_Authority_Strategy_effective_from_April_2016.pdf)"
WP16 b - Waste development is defined as major development in Section 2 of The Town and Country Planning (Development Management Procedure) (England) Order 2010. Any development for waste on this site (which is what the policy is allocating) would be classed as a major development. Therefore the policy is consistent with national policy.

WP16 e – existing wording preferred as “where practicable” is too imprecise.

POLICY WP17: DESIGN OF WASTE MANAGEMENT SITES

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<tr>
<td>90627302</td>
<td>Natalie Beal (received via email), Planning Policy Officer, The Broads Authority</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>• WP17 – where does landscape impact come into consideration? It is not clear if criterion d relates to landscape? As written, criterion d does not seem comprehensive or clear. Suggest point c to incorporated landscape more explicitly and additional point added for amenity. Could a reference be made to GP4 as in other policies?</td>
<td>Landscape would be considered under Point d).</td>
</tr>
<tr>
<td>90765569</td>
<td>Miss Charlie Christensen, Planning Advisor, Environment Agency</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>We would like to see in this Policy that waste management facilities include energy efficiency in their design.</td>
<td>Policy WP17, states that waste management facilities should also meet the criteria in Policy GP2, part “a” of which highlights a number of energy efficiency measures that facilities should use.</td>
</tr>
<tr>
<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>We welcome the amendment in response to our previous comments.</td>
<td>Noted.</td>
</tr>
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</table>
### Policy WP18: Safeguarding of Waste Management Sites

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<tr>
<td>89424292</td>
<td>Mr Philip Dash (received via email), Senior Planner, Essex County Council</td>
<td>This policy states that ‘District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the 250 or 400 metre safeguarding zones as defined in the Appendix 3 Safeguarding Maps. The County Council will then refer to Policies WP18 before providing a consultation response’. Through the current policy wording it seems as though the decision as to whether a proposal conflicts with waste interests is to be taken by the local planning authority. In order to ensure a uniform approach it is considered more appropriate to define the development types that would be in and out of scope of this policy at the outset. This then requires that the County Council is consulted on all developments of the appropriate type and then the M&amp;WPA can take the decision as to whether they would conflict with waste interests or not. The policy further states that ‘The County Council will then refer to Policies WP18 before providing a consultation response’. It is unclear how reference to this policy (singular) will aid in coming to a decision as to whether there are safeguarding implications. Reference should be made to the relevant planning applications.</td>
</tr>
<tr>
<td>90540628</td>
<td>Mrs Sarah Barker, Senior Planning Officer, Ipswich Borough Council</td>
<td>The Council supports the terms of the Policy WP18 as worded because it provides appropriate safeguards for Waste Management sites during the plan period. However, as identified in the related matter of Concrete Batching Plant (CB5), Sir Alf Ramsey Way, Ipswich the Council objects to the safeguarding of the site HWRC6 for the reasons identified in the Preferred Options stage.</td>
</tr>
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</table>

It is assumed that the Local Planning Authority is able to make a sound judgement whether or not to consult the County Council. The last paragraph (which refers to policy WP18) is describing how the policy will work in practice. The purpose of policy WP18 is in the plan to guide how safeguarding implications will be assessed and how SCC will respond to these implications.
‘It is acknowledged that there are limited existing waste related sites in Ipswich Borough Council administrative area. However, the Council has for a number of years supported the relocation of the Sir Alf Ramsey Way/West End Road recycling plant. As you are no doubt aware, the Borough is not able to accommodate sufficient residential allocations within its boundaries to meet its housing need. This site has been championed as a potential housing site for a number of years and little progress has been made. For example, it was previously identified as a potential development site in the 2007 IP-One Area Action Plan Preferred Options. It would be useful if this ambition could be positively supported by the county as it is not located in an area suitable for such a use in the short to medium term.’

(Note: The Council has also made a related submission concerning the Concrete Batching Plant (CB5), Sir Alf Ramsey Way, Ipswich, on nearby land and which the Council believes should be jointly planned in a comprehensive manner and a separate submission is made in that respect.)

In the absence of there being some recognition of the Council’s ambition to upgrade this part of the river front in Ipswich, The Council has agreed to submit an objection as follows:

The submission draft plan does not address the concerns raised at Preferred Options stage and the Submission Draft continues to safeguard HWRC6 and CB5 at Portman’s Walk/Sir Alf Ramsey Way in Ipswich. The Borough boundary is drawn very tightly and the partner authorities within the Ipswich Housing Market Area will expect Ipswich Borough Council to explore all redevelopment opportunities that may exist within the core of the town to meet the Borough’s housing need. The site opposite, Bus Depot, Sir Alf Ramsey Way/West End Road, is already a mixed use allocation through the adopted Ipswich Local Plan, 2017 (IP004). The two sites safeguarded by the M&W plan – HWRC6 and CB5 – may represent important opportunities for residential development during the Ipswich Local Plan period to 2036. The Borough Council would welcome the opportunity to plan and ensure any necessary reprovision of minerals and waste infrastructure, on suitable sites.
positively with Suffolk County Council for the relocation of these facilities and subsequent re-use of the land for housing. As this site might also be subject to the safeguard of Policy WP4 a separate objection is submitted but could be read in conjunction with the above. Add within the WP18 policy box an additional clause…

The County Council will accept development proposals on safeguarded sites where they have been promoted through a local plan process and an alternative facility has been provided. Alternatively, an additional sentence for Para 6.34 may be sufficient. HWRCs will be safeguarded by the terms of WP18 unless their re-use has been promoted and an alternative facility provided as part of a Local Plan process.

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<tr>
<td>90627302</td>
<td>Natalie Beal (received via email), Planning Policy Officer, The Broads Authority</td>
<td>-</td>
<td>• WP18 comments as per MP9 regarding ‘Any mitigation required falls on the development that receives planning permission last’</td>
</tr>
<tr>
<td>90776063</td>
<td>Mr Stewart Patience (received via email), Spatial Planning Manager, Anglian Water</td>
<td>Yes</td>
<td>WLP18: Safeguarding of waste management sites – sound. Anglian Water is supportive of Policy WLP18 as it would help to ensure that occupied land and buildings proposed in proximity to existing sites would not prejudice the continued operation of existing water recycling centres as identified in Appendix 3 of the Local Plan</td>
</tr>
<tr>
<td>90819480</td>
<td>Mr Philip Rowell</td>
<td>-</td>
<td>This representation needs to be read alongside the ABP representation submitted in respect</td>
</tr>
</tbody>
</table>

The intention of this policy is to ensure that the operation of existing or permitted minerals developments are not then prejudiced by other development that comes forward in the vicinity of the minerals operation. In the scenario where planning permission for housing was granted after a minerals facility was permitted, but not implemented, the housing would be required to provide the mitigation to address issues arising from a minerals facility and housing being in close proximity to one another. It would not be practical for the site which is implemented last, as this could require changing planning permissions that are already granted.

Noted.
of policy MP9. For the reasons explained, in summary, in that representation, it is unsound for the Council through the emerging Minerals and Waste plan to seek to safeguard land and facilities within these Ports for a particular minerals or waste related trade or use, whilst those sites form and remain part of a statutory port estate.

Having said this, however, ABP does welcome and support the aspect of policy WP18 which seeks to ensure that the ongoing use of the facilities listed – including those within the two ports - is not adversely impacted upon by other development proposals occurring in proximity to them. However, as indicated in the representation on policy MP9, such protection can only be applied to sites within an operational port in certain circumstances.

**Policy WP18 needs to be amended along the following suggested lines. Additional text is shown in bold italicised text and deleted text is shown crossed through.**

*Policy WP18: Safeguarding of waste management sites*

The County Council will seek to safeguard existing sites and sites proposed for waste management use **that are not located on port operational land** as shown on the Proposals & Safeguarding Maps and will object to development proposals that would prevent or prejudice the use such sites for those purposes unless suitable alternative provision is made.

Development proposals in close proximity to existing sites **that are not located on port operational land**, should demonstrate that...
they would not prejudice or be prejudiced by a waste management facility. The safeguarding policy will also apply to any site where planning permission has already been granted.

8. **IN RESPECT OF EXISTING OR POTENTIAL WASTE MANAGEMENT SITES AND FACILITIES LOCATED ON OPERATIONAL PORT LAND, THE REQUIREMENTS IN THE PRECEDING PARAGRAPH WILL ONLY APPLY IN CIRCUMSTANCES WHERE:**

(iii) an existing or potential site or facility on operational port land is potentially impacted upon by a third party non-port related development; and / or

(iv) where the statutory port authority sells off the site in question or makes it available for non-port and port related development.

Any mitigation required falls on the development that receives planning permission last.

District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the 250 or 400 metre safeguarding zones as defined in the Appendix 3 Safeguarding Maps. The County Council will then refer to Policies WP18 before providing a consultation response. ‘

**IT IS ALSO SUGGESTED THAT A PARAGRAPH OF SUPPORTING TEXT AFTER PARAGRAPH 6.34 IS INSERTED, AND THE RELEVANT WASTE MANAGEMENT SITE THAT IS LOCATED ON PORT OPERATIONAL LAND IS DISTINGUISHED IN THE LIST OF SITES PROVIDE AT APPENDIX 3 OF THE PLAN AND**
### 9. Barham

**Policy MS1**

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<tbody>
<tr>
<td>90447939</td>
<td>Mr James Meyer, Suffolk Wildlife Trust</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>We note that this site was previously included in the Suffolk Minerals Specific Site Allocations DPD, we also note the conclusions of the ecology section relating to this site (section 8.16). In addition to the ecological receptors identified, extensions in this location could result in adverse impacts on UK Priority habitats (such as hedgerows and deciduous woodland) and UK Priority species (including birds such as turtle dove and linnet). The proposal could also result in adverse impacts on badgers. It must be ensured that any extraction proposal in this location adequately assess the likely impacts on biodiversity and includes appropriate mitigation measures. It must also be ensured that any extraction delivers a restoration plan which significantly enhances the biodiversity value of the area. We understand that the existing proposal is to return the site to agricultural use, however the current site is currently developing value for biodiversity and we therefore request that an alternative restoration scheme, to a more ecologically beneficial use, is secured. Amend policy to include reference to assessing and mitigating impacts on all relevant designated sites, protected and/or Priority species and habitats.</td>
<td>Impacts on ecology will need to be adequately addressed with any planning application which are requirements that are set out in Policy MS1 and Policy GP4. SCC encourages restorations that provide gains for biodiversity, even if the restoration includes other uses, through policy MP6.</td>
</tr>
<tr>
<td>90818618</td>
<td>Farah Chaudry</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Policy MS1: Barham</td>
<td>It is the intention of Policy MS1 (and Policy GP4) to protect important geological designations, (paragraph</td>
</tr>
</tbody>
</table>
The proposed southern extension to Barham Quarry includes a section of Sandy Lane Pit, Barham SSSI which is notified for its quaternary geology.

We consider the allocation 8. Barham is not consistent with the objectives of paragraph 118 of the NPPF and is therefore unsound because the proposal to backfill with inert materials within the SSSI would prevent access to the notified interest feature and would render the SSSI in effect ‘part destroyed’. Natural England’s concerns would be overcome if we had confirmation that there will be no backfilling within the SSSI boundary.

The policy text mentions d) potential impacts upon natural history interests including Sandy Lane Pit Barham SSSI; note that the SSSI is designated for its geology not its biodiversity, so the policy should be re-written to state d) potential impacts on geological interest features of Sandy Lane Pit, Barham SSSI and the biodiversity interest of Oak Wood/Broomwalk Covert County Wildlife Site etc.

| 90610097 | Mr Jonathan Worsley (received via email), Consultant, PDE Consulting | Yes | Yes | Yes | With reference to the above, we are writing in support of the site at Barham being included within the pre-submission draft documents. | Noted. |

<p>| 90740351 | Mr Steve Merry (received via email) | - | - | - | To clarify the LHA comments recorded in Paragraph 8.7 the requirement to keep vegetation clear of junction visibility splays applies to both the site | Modify Paragraph 8.7 to include reference to the Sandy Lane access to Norwich Road as well as the quarry access to Sandy Lane. Paragraph 8.24 |</p>
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<tr>
<th>Reference</th>
<th>Name and Role</th>
<th>Rating 1</th>
<th>Rating 2</th>
<th>Rating 3</th>
<th>Text</th>
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</thead>
<tbody>
<tr>
<td>90765744</td>
<td>Miss Charlie Christensen, Planning Advisor, Environment Agency</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>This Policy could be enhanced through the addition of a requirement that landscape and habitat surveys should be carried out prior to development. The Northern extension to the quarry could destroy a sinuous belt of woodland within the boundary along Dangerous Lane. To determine whether any loss of important natural asset is being lost here landscape and habitat surveys should be carried out with a specific focus on this area. It might be beneficial to retain the woodland strip as a buffer between the pit and Local Wildlife Site woodland to the North. Assessments of habitats and landscape will be required as part of any proposal as set out in the general environmental criteria policy, GP4. Assessments at the planning application stage should set out how any impacts on ecology would be minimised adequately mitigated.</td>
</tr>
<tr>
<td>90772535</td>
<td>Mr Mike Jones (received via email), Conservation Officer, RSPB</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>The strategic planning requirements set out in NPPF paragraphs 109, 114 and 117 (see our comments on the Vision, Aims and Objectives) and the requirement of policy MP6, which states that ‘preference will be given to restoration proposals that incorporate a net gain for biodiversity’ and ‘providing links to surrounding habitats is also encouraged’, indicate that it is appropriate for the plan to include strategic guidance on the most appropriate restoration proposals. We would also recommend that in the course of revising the HRA for this plan, that revisions to site policies giving guidance to the most suitable forms of biodiversity restoration are an acceptable means of ensuring that the plan is effective and that sites can deliver any restoration proposals required under HRA. For this site, we recommend that the following are incorporated into the site policy and/or supporting text where appropriate. SCC considers that it is appropriate to determine the restoration of sites at the planning application stage, however advice from RSPB is helpful and noted.</td>
</tr>
<tr>
<td>90616219</td>
<td>Mr Chris Hemmingsley (received via email), Senior</td>
<td>-</td>
<td>-</td>
<td>Brett welcome the continued inclusion of the three Brett Quarry site extensions (Barham, Layham and Pannington), within the submission draft plan. Having reviewed the site selection reports, consultation representations and the respective SCC responses</td>
<td>Noted.</td>
</tr>
</tbody>
</table>

Turtle dove and nightingale are likely to be present in this area based on available information. Given the conservation importance of these species, we recommend that surveys are carried out to identify areas used by these species, and opportunities are sought to retain any suitable habitat during the working of this site. This could include, for example, marginal scrub and hedgerows.

Restoration We note that the Site Selection Report proposes that the quarry area will be restored to an agricultural after-use. We recommend that the restoration of this site should incorporate habitats for nightingale and turtle dove, due to their likely presence in the wider area. This would be in accordance with draft minerals policy MP7, which states that:

“Preference will be given to restoration proposals that incorporate a net gain for biodiversity with the creation and management of priority habitats and that support protected priority and Red Data Book Species and/or that conserve geological and geomorphological resources. Such habitats, species and resources should be appropriately and sustainably incorporated into restoration proposals focussed on flood alleviation, reservoirs, agriculture, forestry, amenity, or ecology.”

Specific measures for turtle dove that could be employed both during quarry management and restoration can be found in Annex 1 to our Preferred Options consultation response. The BTO leaflet ‘Managing Scrub for Nightingales’ contains advice about the creation and management of habitat for nightingale, which could also be incorporated into management and restoration plans.
for each of the three Brett sites, we have no further comments to add at this stage.

90771284 Mr Phil Cobbold (received via email) , Phil Cobbold Planning - - - I act for Mr K Elman of The Lodge, Church Lane, Barham IP6 0QE.

My client has instructed me to object to the Suffolk Minerals & Waste Local Plan.

My client’s property is within 100m of the proposed site at Barham. Mr Elman is extremely concerned that mineral extraction from the site will have a significant and detrimental impact on his amenity in terms of dust and noise disturbance from the mineral extraction process and from the resulting HGV movements within and to and from the site.

Mr Elman also considers that the local road network is unsuitable for the HGV movements that would be generated and that consequently, the development would impact on highway safety.

My client is very concerned that the details of the proposed minerals site, as set out in the consultation document, does not even include any assessment of how the mineral extraction would impact on residential amenity.

The Council must carry out a detailed impact analysis before making any decision on the Barham Site

I would be grateful if you could acknowledge receipt of this email.

The Council must carry out a detailed impact analysis before making any decision on the Barham Site

All planning applications (including for the extension to Barham if one is received) will be assessed against policy GP4, which requires that residential amenity is assessed and addressed before planning permission can be granted. Policy GP4 also includes requirements for planning applications to assess and address impacts on the highway network.

10. **BARNHAM**

*Policy MS2*
<table>
<thead>
<tr>
<th>Reference Number</th>
<th>Respondent</th>
<th>SCC Response</th>
</tr>
</thead>
</table>
| 90387206         | Mrs Caroline Dowson (received via email), Parish Clerk, Barnham Parish Council | Definition as a quarry  
The definition of implementation of planning permission is not the result of a policy held by SCC, but is a legal definition as set out in the Town and Country Planning Act 1990 section 56, which states "development shall be taken to be begun on the earliest date on which any material operation comprised in the development begins to be carried out." The raising of the bunds would be classed as a material operation, meaning that legally the planning permission has been implemented.  
Agricultural tenancy  
The current tenancy on the land is a matter between the tenant and the landlord and SCC can not be involved. Compensation between the tenant and the landlord is not an issue that can be addressed through planning policy.  
Recycled aggregates  
Recycled aggregates have been considered within the Local Aggregate Survey 2018 2017 data) which makes part of the plan's evidence base and policy. Recycled aggregates do contribute to the supply of aggregates within Suffolk, and policies in the plan safeguard existing aggregate recycling facilities, and set out criteria in the case that planning applications for new facilities are submitted. However, as recycled aggregates rely on a supply of construction and demolition waste, which is finite. Therefore, a planned landbank of land won minerals is required to ensure adequate supply for the construction industry. |

Barnham Parish Council would like to object to the inclusion of the proposed quarry at North Farm into the Minerals and Waste policy consultation and would like to register the following comments regarding the soundness of this plan. This submission is based on consultation with local residents who have already submitted objections to this proposal during stage 2. This letter states the reasons for the objection and also attached is the “Publication Stage Representative Form” duly completed.

Suffolk County Council’s response to our query to the first stage of the consultation regarding the validity of this site as a working quarry stated that, as a result of the planning permission and the erection of the bund, it was, officially, classified as a quarry. In the opinion of the Parish Council this would appear to be an inappropriate interpretation of the planning policy bearing in mind the sensitive nature of this location in terms of possible environmental and ecological damage that this site could do. This planning policy needs to be revised in order to more clearly identify the classification of a quarry and to make interpretation more stringent especially in areas of ecological sensitivity. Planning approval expires in Mar 2019 so, failing approval of a further extension, this site could no longer be classified as an established quarry after this date. There is a humanitarian effect this quarry will have on the livelihood of the local tenant farmer. Planning Policy does not take this into account and, therefore, in the opinion of the Parish Council, this failure makes the policy unsound as a development criterion for this quarry. As a result of the original planning approval, the local tenant farmer has been denied the use of the land. The loss of this land to the tenant farmer does not fall within the Planning and Compulsory Purchase Act, but the effect on this farmer’s livelihood will be worse than it would have been had he been the subject of the PCP Act. The policy is flawed in that it enables no statutory compensation from the landowner to the farmer as a result of the removal of this land.
from the farmer’s business. There will be a further reduction in the size of this farm if the proposal for this site goes ahead. As the quarry has never been active, the land has stood fallow since 2012 and has served no practical purpose as either farmland or quarry. Taking into account the demands that Brexit may present for our food industry, the loss of farmland would be short sighted and irresponsible. Planning Policy is outdated in the light of national events surrounding our exit from the EU, making the reliance on this policy, on this issue, an unsound basis for this consultation.

The policy fails to accurately identify recycled aggregate sources that would enable a lower quantity to be extracted from new or extended quarrying. This plan is, therefore unsound until such investigations have been completed and these figures included in the overall totals. The Suffolk Waste Study was carried out in 2015 and is three years out of date.

Policy MS2 and GP3. The site sits, crucially, to the west of Barnham village. Due to the prevailing winds this puts the village in the path of noise and air pollution resulting from workings on the site. There are houses that sit within a distance that would cause serious concerns for the health of the occupants. The proposed site almost abuts the grounds of the North Farm farmhouse.

There is already an environmental issue with the increase in traffic on the C633. The C633 was never meant to be a strategic or local access lorry route, but was meant as a temporary route for southbound HGVs to avoid Thetford. However, the volume of traffic using this road now causes an environmental problem from noise and pollution. Any additional source of noise or air contamination should be prevented.

During the original application for this quarry, the Planning and Development Section of Suffolk County Council expressed concern about the number of vehicles routing past Elveden School. If this quarry is included in the Minerals and Waste Local Plan, then the number of vehicles would not only exceed the numbers concerned in the original application, but would be over a much more prolonged period of time.

Suffolk County Council’s response to comments regarding vehicle movements states that there would be no effect on C633 due to the proposed routing to Contract Farm. However, this does not take into account the vehicle movements that will

**Noise**

Assessments of noise impacts and provision of appropriate mitigation are required under Policy MS2. At this stage, SCC Noise Consultants identified that an additional standoff area may be required, in addition to standard mitigation, to protect the amenity of nearby residences.

**Air quality**

At the planning application stage an Air Quality Assessment will be required, to identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, including management of dust.

**Traffic**

Policy MS2: Barnham. Requires the use of an off road haul route to Contract Farm where it is stockpiled. The Policy also requires measures to maximise highway safety and minimise amenity impacts at Elveden Primary School.

Add an additional clause to Policy MS2 Barnham: “q) a traffic management plan drafted to avoid traffic routeing through local villages including Barnham except in the case of local deliveries.”

**Ecological and visual**

Detailed assessments of the potential ecological and landscape impacts of the site must be submitted as part of the planning application and these must inform measures to adequately mitigate these impacts. Additionally a restoration scheme that satisfies SCC must be submitted as part of the planning application and it is currently expected that this site will be restored to a condition that would secure a net gain for biodiversity. The Plan has also been the subject to an Appropriate Assessment which indicates this. The site is larger than that which is currently permitted, however the site will be phased, meaning that not all of the site will be extracted at once. Extraction will occur in...
take place to distribute the aggregate to the various end users. These vehicles will have to route past the Elveden school and would then either route through Brandon and the busy High Street; south towards Bury St Edmunds and through areas unsuitable for HGVs. (neither of these routes are part of the strategic lorry route but are only part of the local access routes); west onto the A11 into Norfolk or Cambridgeshire or north through Elveden village and subsequently down the C633 towards Bury St Edmunds. Travelling in this direction, the vehicles would not be breaching the weight restriction on C633, contrary to the assertion by the Suffolk County Council response. There are already constant breaches of this weight restriction that Suffolk County Council Highways fail to address and so additional restrictions placed at the planning stage are unlikely to be effective.

**Policy MS2** aims to “only minimise the risk to properties within 250m of the site”. This is not an acceptable risk level when considering human health and the unnecessary siting of this quarry within the vicinity of human population and the consequential effects of increased traffic. **Policy MS2** is, therefore inadequate.

**Policy GP3, Spatial strategy**, states that preference will be given to proposals for minerals and waste development in accordance with the Key Diagram where individual sites are well related to the Suffolk Lorry Route Network (or rail network or navigation) centres of population and do not have adverse impacts upon features of environmental importance (natural or man-made) or endanger human health. **If this site is included in the plan then it would seem to be in breach of this policy, and therefore, make the proposal unsound.**

**Policy CS2**

The proposed site sits in, and would affect, nature conservation areas. **Policy CS2** states that development needs to protect and enhance biodiversity and wildlife and avoid impacts on areas of nature conservation interest (such as the three international sites) and that, where appropriate, the ecological features of a development site will be valued and enhanced. This policy also states that only development that will not adversely affect the integrity of the Breckland SPA will be permitted.

During the original quarry application several species were identified as vulnerable to this type of development and questionable mitigating measures were put in place to protect sections and before a new section can be extracted, restoration will need to begin on the previous section of the quarry.

In respect of the visual impact the bund is a visible albeit temporary feature and serves to screen the workings from the C633 to the north. Following extraction restoration will return the site to a mixture of agricultural land and heathland habitat.

**Flooding**

Sand and Gravel extraction is defined as ‘water compatible development' by paragraph 066 of the National Planning Practice Guidance. This means that this type of development is less vulnerable to flooding as there is low risk to people or property and so this use can be acceptable in areas of flood risk.

**Spatial**

In terms of Policy GP3 SCC contents that the proposed site is in accordance with Policy. It is well related to the Suffolk Lorry Route Network and major centres of population. It would not have a significant adverse impacts upon features of environmental importance.

**Water resources**

The site is within a Groundwater Source Protection Zone, which will require assessment to ensure that the extraction methodology does not compromise this water source.

**General considerations**

Policy MS2 contains a list of site specific criteria, including environmental, which any planning application for the extension must comply with, as well as the criteria within other policies in the plan.

The plan is an in-principle document and at the planning application stage assessments of environmental impact and impact on local
them. This protection may have been viable in relation to the original 14.9ha site and the limited duration of the approval, but the increased area and prolonged timescale of this new quarrying must have a detrimental effect on the survival of these rare species and protected habitats. This development affects the integrity of the Breckland SPA and therefore the plan to include this site must be unsound.

From a visual amenities point of view, the current bund is already an eyesore and these additional workings would be clearly seen from the C633 and the view of a typical Breckland valley would be hidden.

Flooding and Policy GP4

The original application for the quarry failed to accurately investigate the implications of the relatively high water table in the area of the proposed excavations. There is a watercourse to the west of the current site, Hunwell Spring, that starts as an open watercourse and upon entering the extraction area becomes a piped watercourse. This watercourse would be compromised if extractions were allowed in the revised area. The depth of the water table is such that in the winter months (which is when extraction is proposed) flooding is likely to occur and this was confirmed when bore holes were sunk for test purposes prior to the current bund being erected. There was evidence of this potential flooding, yet no concerns were expressed by Suffolk County Council when considering the inclusion of this site in the proposed Plan. Policy GP4 states that there should be proposals for the potential implications of flooding. The potential for flooding is real. A consequence of the erection of the current bund was significant flooding to the field west of the bund. Policy GP4 has been ignored with this current quarry, and the plan is, therefore, unsound.

Summary and Recommendation

For the reasons set out on this form, the inclusion of this site in the Minerals and Waste Proposal would contravene Aim 2, Objective 5 of the Preferred Options Draft, as there are no current specific environmental protection policies in place. There are also other key Policy Statements that would need to be addressed concerning this site (eg. Policy GP4). Including this site in the proposal would give undue weight for an approval to any future planning application to formalise these areas as a quarry. We have already seen the cynical use the landowner has made of his original application to extend the prohibition of the quarry site to the local farmer. If there is valid amenity will still be required, and these will need to demonstrate that the impacts can be mitigated before planning permission is granted.

Aggregates provision

Whilst the plan does contain an overprovision of minerals SCC considers this appropriate in order to ensure a flexible supply of aggregates. Other sources, such as marine dredged and recycled aggregates have been considered as part of the supply, however, there is not certainty that there would be adequate supply from these sources: recycled aggregate is dependent on material from construction and demolition waste, which can not be guaranteed; and while large quantities of marine dredged aggregate are licenced off the coast of East Anglia, relatively small quantities of this are landed in Suffolk and where this material is landed is determined by the market.
quarrying potential on the Elveden Estate then perhaps there are more suitable sites in less sensitive areas and less harmful to a family livelihood.

The Parish Council is of the opinion that the removal of this site would not create a shortfall in the supply of sand and gravel to meet demands to 2036, as the calculated output from all the other sites would exceed the requirement and if an effective recycling policy was implemented the output could well exceed the demand without the inclusion of this site.

Suffolk County Council has sidelined most of the responses to objections to this site with the explanation that issues will be dealt with at the planning stage. If this site is included in the Minerals and Waste Plan then, given the number of objections raised at the first stage of the consultation, any subsequent objections during the planning application process are likely to be sidelined in a similar manner. There are sufficient grounds for concern, expressed by individuals and organisations, about the inclusion of this site that there is no justification for including it in the Plan. **There are policy contradictions and omissions that question the soundness of this plan.**

Please note that the Parish Council’s Chairman, Edward Wyer, would like to participate at the oral part of the examination (point 7/8 of the response form) to represent Barnham Parish Council.

<table>
<thead>
<tr>
<th>90448352</th>
<th>Mr James Meyer, Suffolk Wildlife Trust</th>
<th>No</th>
<th>No</th>
<th>-</th>
</tr>
</thead>
</table>

This site is within the Breckland Special Protection Area (SPA) and the Breckland Farmland Site of Special Scientific Interest (SSSI), these sites are designated for internationally important numbers of breeding stone curlew (along with woodlark and nightjar for the SPA). The site is adjacent to Thetford Heath SSSI and National Nature Reserve (NNR), Thetford Heath is also a component of the Breckland Special Area of Conservation (SAC). We note that it is proposed to only operate the site outside of the stone curlew nesting season to avoid impacts on breeding stone curlew. However, we query whether the loss of the availability of this area of land to nesting stone curlew has been assessed? Such impacts must be assessed as part of the Habitats Regulations Assessment (HRA) for the Local Plan and sites should not be allocated which would result in an adverse impact on the designated sites. It must also be ensured that should any extraction be allocated in this location, that the site restoration plan maximises the area’s value for the species for which the SPA

SCC has undertaken an Appropriate Assessment under the Habitats Regulations, to assess the impact on European sites and has undertaken consultation on the updated assessment since SWT’s representation was made.
and SSSI are designated.

It must be ensured that the site is suitable for extraction through the HRA process and that the Local Plan Policy secures any necessary strategic mitigation measures identified as part of this. This is in addition to the requirement for a project level HRA to be undertaken at the planning application stage, should the site be allocated.

<table>
<thead>
<tr>
<th>Dr Natalie Gates, Historic England</th>
<th>-</th>
<th>-</th>
<th>This paragraph has a heading &quot;Historic Buildings&quot; but it covers listed buildings and registered parks and gardens. The heading should be amended for clarity.</th>
<th>Disagree, the existing heading is preferred as it refers to the consultee not an entire list of the issues that are referred too.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dr Natalie Gates, Historic England</td>
<td>-</td>
<td>-</td>
<td>We note the corrected typographical error.</td>
<td>Noted.</td>
</tr>
<tr>
<td>Dr Natalie Gates, Historic England</td>
<td>-</td>
<td>-</td>
<td>We welcome theew change in response to our previous comments stating that historic buildings will be affected, however these buildings have not been identified as listed, three of which are highly graded. There are five listed buildings within the former Atomic Bomb Store, which also is a scheduled monument. Three are grade II* and two are grade II. in addition, Carine Cottage and Meadow Cottage, both grade II, are close to the site. Please see our comments below on the Sustainability Appraisal in relation to Barnham. Please amend the supporting text to reflect.</td>
<td>Disagree, there is no need to list individually every single listed building and only those that are considered to be affected are mentioned.</td>
</tr>
<tr>
<td>Dr Natalie Gates, Historic England</td>
<td>-</td>
<td>-</td>
<td>Please note that we cannot support the principle of an allocation in such a sensitive historic environment. Given the sensitivity of the historic environment, if this site is to remain allocated and in the absence of strategic policies the policy wording needs to be improved in order to be sound because as drafted the policy does not adequately protect highly graded design heritage assets (the framework, paragraph 132 and paragraph 143 (bullet points 6 and 8)). As this remains an allocated site we welcome the introduction of site specific policy wording for Barnham. we particularly welcome the archaeological policy requirement in response to our previous comments. whiles twe welcome a separate policy requirement for the Barnham Atomic Bomb Store, as currently drafted we it is unsound. It focuses on the scheduled monument and does not include the listed buildings and it does not.</td>
<td>Disagree. The principle of sand and gravel at this site has already been established with the existing planning permission which features temporary screening, phased working and progressive restoration back to a heathland habitat. The existing permission has been renewed twice and neither time has Historic England objected.</td>
</tr>
</tbody>
</table>
not include the requirements for temporary mitigation and progressive restoration as setout in our previous letter. These criteria should be specific to Barnham especially as it is not covered by Policy GP4, MP6 and MP7 or would be covered by a strategic historic environment policy. To make the plan sound please amend bullet i to specify that the Atomic Bomb Store is a scheduled monument and included listed buildings and incorporate the specific mitigation and aftercare measures detailed below:

These highly graded designated heritage assets require a programme of temporary mitigation to setting along with with the Elveden Roade side of the site, progressive restoration which could enhance the setting of the designated heritage assets through returning the land to heathland setting.

90818618 Farah Chaudry (received via email), Team Leader, Norfolk & Suffolk, Natural England - - - Policy MS2: Barnham We suggest that the dates of the stone-curlew nesting season are included for clarity, i.e. March to September.

We advise amending the wording in relation to nature conservation to include the following:

j) likely adverse effects (either individually or in combination with other developments) on the notified special interest features of Breckland SPA, Breckland SAC, Breckland Farmland/Little Heath, Barnham/Thetford Heaths SSSIs, etc.

Further information on any required avoidance/mitigation measures at this site should be provided within the Plan (cross-referencing to the HRA) as well as indicating the need for detailed project level HRA.

Disagree, because all of these aspects are adequately covered by the existing policy and would be considered in detail as part of the planning application process. For example the consideration of in-combination effects is part of the Environmental Impact Assessment Process.

90156241 Mrs Clare Watson - No - An appropriate independent assessment under the Habitat Regulations has been [sic]

Since the Submission Draft Consultation SCC has produced and consulted upon an Appropriate Assessment as required by the Habitat Regulations.

90644983 Miss Caroline Jeffery, Principle Planner (Minerals) - - Yes Norfolk County Council has the following comment to make:

The site allocated at Barnham for mineral extraction is located within the Breckland SPA. The Task 1 Screening Habitats Regulations Assessment, which has been carried out on the policies and specific site allocations of the Suffolk Minerals and Waste Local Plan, concludes that the allocation of this site “will...
and Waste Policy), Norfolk County Council

have a neutral effect upon the designated sites until such time as a project-specific HRA screening process and Appropriate Assessment has been undertaken”. If sites were proposed for mineral extraction within the Breckland SPA in Norfolk, we would only consider making such allocations if a Task 2 Appropriate Assessment of the relevant Local Plan policies concluded that ‘no adverse effects are expected on the integrity of the SPA’ in order to have confidence that the sites would be deliverable. We consider this approach would be in accordance with the Conservation of Habitats and Species Regulations 2010; unless Natural England advise otherwise.

| 90740351 | Mr Steve Merry (received via email), Transport Policy and Development Manager, Suffolk County Council | - | - | No additional LHA comments | Noted. |

| 90689344 | Mrs Clare Watson | - | No | | |

I do not believe that the inclusion of Barnham in the SWMP is sound as Suffolk County Council have not provided any evidence of following their own ‘Air Quality Management and New Development’ guidance 2011. In particular section 1.4.4 It states that ‘The Government’s commitment to the principles of sustainable development were set out in ‘A Better Quality of Life – A Strategy for Sustainable Development for the UK’, May 1999 and superseded by “Securing the Future delivering UK sustainable development strategy”, in March 2005. Eight principles of particular relevance to planning and pollution control were set out: -

- Taking a long term perspective - around 2,500 children will be exposed to higher concentrations of pollutants and particulates in the proposed 30 year extraction period with little regard or concern shown for the impact this will have on their health outcomes despite increasing medical evidence linking air pollution with disease and early death and reported by Suffolk County Council and others

https://www.healthysuffolk.org.uk/jsna/reports/jsna-topic-reports/air-quality. The young are particularly susceptible to Air Quality

The Land Use Planning & Development Control: Planning for Air Quality by the institute of air quality management, is now used in preference to the 2011 Suffolk Supplementary Planning Guidance, which is stated in the County Council Website (https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/air-quality-management/)

Both the preferred guidance and the 2011 guidance are primarily focus on development management (i.e. the planning application stage), however the preferred guidance does stress “the importance of having good air quality within policies within local planning authority frameworks.” SCC has achieved this through policies GP4, which requires all minerals and waste planning applications to assess any potential air quality issues. Air quality has been
https://www.unicef.org/environment/files/Danger_in_the_Air.pdf

John Holloway, Professor of Allergy and Respiratory Genetics at Southampton states that “These effects can have a permanent influence on growth and health throughout life. Exposure of the young child to air pollution can produce definite harm and increase the risk of disease both immediately and throughout the rest of their lives. We must act now to ensure our future generations are not put at risk.”

https://www.southampton.ac.uk/news/2016/04/health-impact-of-air-pollution/page Stephen Holgate, Medical Research Council Clinical Professor of Immunopharmacology at the University of Southampton, chaired the Royal College of Physicians and Royal College of Public Health working party on air pollution that produced the report ‘Every breath we take’ states “We now know that air pollution has a substantial impact on many chronic long-term conditions, increasing strokes and heart attacks in susceptible individuals. We know that air pollution adversely affects the development of the foetus, including lung development. And now there is compelling evidence that air pollution is associated with new onset asthma in children and adults. When our patients are exposed to such a clear and avoidable cause of death, illness and disability, it is our duty to speak out.”

https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-long-term-impact-air-pollution . The report suggests that air pollution monitoring by central and local government must track exposure to harmful pollutants in major urban areas and near schools. These results should then be communicated proactively to the public in a clear way that everyone can understand.

- Putting people at the centre; The health of school children and local residents appear less valued than the Stone Curlews whose breeding season will be avoided, but the people who live, work and go to school in the area will be exposed to the noise and pollution for long hours six days a week.

- Taking account of costs and benefits; there are no benefits for locals to the inclusion of Barnham in the SWMP only severe costs in terms of health and access to amenities

- Respecting environmental limits; How can a quarry be permitted in such an environmentally sensitive area that

considered on every allocated site in the plan, including Barnham, by an air quality consultant during the site selection process. In addition Paragraph 9.24 of the plan states that an Air Quality Assessment is expected with a planning application. The current expected levels of traffic are not anticipated to exceed the threshold currently defined by the IAQM/EPUK guidance for significant increase to local pollution concentrations. Additionally, there is a requirement in the policy (part “f”) allocating the site that the safety and amenity impacts on Elveden Primary School.

Other elements of human health and amenity have also been considered within the plan policies. Policy MS2 requires the applicant to address air quality (part “k”), noise (part “n”), and water quality (part “n”).

Ecology
During the site selection process ecologists at SCC considered the potential ecological impacts. Additionally, SCC carried out an Appropriate Assessment as part of the Habitats Regulations and undertook a focused consultation on this assessment.

National Planning Policy Framework
SCC has addressed the requirements of the National Planning Policy Framework paragraph 109 through: the environmental criteria in Policy GP4 which includes requirements for planning applications to address landscape character, visual impact, protected landscapes, biodiversity, geodiversity, the local water environment, soil resources, noise pollution and air pollution; preference for biodiversity led restorations in policy MP6; and environmental criteria in specific site allocation policies.

Regarding paragraphs 118 of the NPPF, the potential impacts on SSSI and nature
includes: Breckland SPA, Breckland SAC, Breckland Farmland/Little Heath/Thetford Heaths SSSI, Gorse Grassland CWS, Thetford Heath NNR, European Protected Species (Bats and Great Crested Newt), Priority Species, Other Protected Species, Priority Habitats (Lowland Heath) and a Roadside Nature Reserve. It also does not fit in with Suffolk County Councils aspiration to become the greenest county by extracting sand and gravel from such a sensitive location

- Applying the precautionary principle; No evidence of long term pollution predictions or modelling have been provided
- Using scientific knowledge; No reports have been published by any external professionals who have actually visited the site • Following procedures which are based on transparency, access to information, effective participation by stakeholders and access to justice; not all of the residents within 250m of the site were correctly informed. And
- Making the polluter pay. There has been no mention of who will monitor the Barnham site for potential breaches of planning, nor what the consequence of such breaches might be. These principles have been ignored. Including Barnham in the SWMP does not allow the plan to be delivered sustainably. Section 2.4, of the ‘Air Quality Management and New Development’ guidance 2011 has not been followed - no monitoring and modelling has been published. The inclusion of Barnham in the SWMP should not occur until the air quality has been assessed and the modelling completed.

The NPPF states in point 109 that the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. The plan for Barnham does not abide by these points for the reasons highlighted above.

The policies in the plan do require that the issues presented in paragraphs 120 and 121 are assessed and addressed through policy GP4 and in site allocation policies.

The environmental criteria required by paragraph 143 of the NPPF are set out in policies GP4 and specific environmental requirements of each site have been set out for each site in the explanatory text for each site allocation.

Regarding paragraph 194 and the gas pipeline, this is not under the responsibility of Cadent, but the National Grid. SCC received a response on behalf of National Grid. No objections were raised by National Grid, provided that the 12.5m easements on either side of the gas line are undisturbed.
Point 118 of the NPPF states ‘When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. There are other sites included in the plan where mineral extraction would not create the same degree of significant harm to people who live, work and are educated in the area.

- proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site’s notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest. This is not the case for the Barnham site. The adverse effects on such a sensitive environment have been seriously neglected with no serious assessment of the implications for an area with so many designations designed to safeguard the area.

Point 120 states ‘to prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account. It is not appropriate to include Barnham in the SWMP for the reasons highlighted above.

121. Planning policies and decisions should also ensure that:
● adequate site investigation information, prepared by a competent person, is presented. This has not been done for the Barnham site. This is a serious omission.

Point 143 of the NPPF highlights that Local Planning Authorities should

● set out environmental criteria, in line with the policies in this Framework, against which planning applications will be assessed so as to ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health, including from noise, dust, visual intrusion, traffic, tip- and quarry-slope stability, differential settlement of quarry backfill, mining subsidence, increased flood risk, impacts on the flow and quantity of surface and groundwater and migration of contamination from the site; and take into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality; By including Barnham in the site unacceptable adverse impacts will occur on the natural environment, human health and quality of surface and groundwater.

● when developing noise limits, recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction – 6 day extraction, hauling and distribution over 30 years cannot be considered to be short-term.

194. Local planning authorities should consult the appropriate bodies when planning, or determining applications, for development around major hazards. Suffolk County Council did not inform Cadent that they were planning to extract millions of tonnes of sand and gravel from around the National Gas Ring Main. There have been no health and safety assessments regarding this.

Barnham should not be included in the SWMP without further detailed assessments and impact studies being carried out by independent professionals on the consequences of the proposed development on human and environmental health.

| 89611408 | Clare Watson | - | - | I am writing to state my continued objections to the Minerals and Waste Local Plan 2017. I have objections to the | Not consulted on Issues and Options |
consultation element of the Minerals and Waste Local plan and to the inclusion of the Barnham site in the plan. Although Suffolk County Council has given responses to the Preferred Options I am reiterating my objections to the inclusion of the Barnham Site and highlighting that I find some of the responses to my objections inadequate or absent. My objections to the inclusion of the Barnham site in the MWLP are based on concerns for the impact of the excavations on the sustainability and health of the local community and environment.

As a process, I still believe that the Minerals and Waste Local Plan (MWLP) consultation is significantly flawed. It is impossible to make an informed decision during the consultation of sites into the Minerals and Waste Local Plan when there is so much relevant information missing.

Suffolk County Council’s Statement of Community Involvement (SCI) states that there is a ‘great emphasis on transparency in planning processes, inclusiveness and commitment’ combined with Appendix 1 of the SCI highlighting an early ‘key milestone’ of ‘produce informal issues/options report’ that outlines how ‘All stakeholders will be consulted with including local communities and liaison groups, industry bodies and ‘hard to reach/marginalised’ groups (including ethnic minority groups, teenagers and the elderly)’ however I received no such consultation opportunity. The first point at which I heard that the Barnham Site had been put forward for the MWLP was upon receipt of the postal notification detailing the consultation meeting in Barnham Village Hall. As a member of the local community I am furious that I was denied the opportunity to discuss at the earliest stage a report that will impact upon my whole family’s daily life so severely.

Paragraph 189 of the National Planning Policy Framework states that "Local planning authorities…should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community before submitting their applications” I again ask you to confirm for me whether this was part of the pre-application discussions undertaken with Mick George and Elveden Estate and what their response was. As a family who are tenants of Elveden Estate I am still awaiting any form of communication from them regarding the inclusion of a large

This site was only made known to the County Council at the Issues and Options stage.

Not consulted on Mick George application

NPPF 189

This site is not at the pre-application stage.

Out of date Mapping

The maps provided are the latest Ordnance Survey editions. Updates have been manually to the base maps where attention has been drawn to missing houses.

Extension in time to existing site

Simply because the site is an extension to a currently existing site does not allow it to be more easily included in the SMWLP. Sites must be assessed on their own merits. The evidence base of the plan contains the site selection reports for each site submitted during the call for sites. SCC chose to exclude a number of sites, including those that were extensions to existing sites. Reasons for inclusion or exclusion from the SMWLP can be seen in the conclusions of each site selection report.

Large scale extension to site

The size of the extension is unconnected to the original borrow-pit proposal.

Little benefit to the local area

The economic benefits of planning for minerals extraction sites, including Barnham, is the provision of aggregates for the construction industry, which then enables the construction of housing, infrastructure, and other projects. This must be balanced against other planning considerations, such as environmental and social considerations and negative impacts need to be avoided or mitigated. Through the
area of land that forms part of my family’s tenancy in the Barnham Site. The Rt. Hon Greg Clark MP explains in his ministerial foreword how the National Planning Policy Framework facilitates ‘people and communities back into planning’, yet at the earliest opportunity both myself and the local community have had this possibility denied. No response was given to this query, how can a project of this scale be received with anything but hostility if those who propose it treat the local residents with such contempt.

I was troubled to see that the map shown at Barnham Village Hall during the consultation period was significantly out of date, omitting homes that were built in 2002 and one prior to that. I am glad that the maps have been altered and the homes that were omitted are now included on the maps. I hope that the maps included in the plan have now been checked to ensure there are no further significant errors.

Thank you for confirming that currently no material has been extracted from the Barnham site to date. I assume that the recent request for an extension to the planning permission beyond March 2019 allows this site on appearances to be more acceptable to its use within the SWMP?

The site included in consideration for the SWMP is such a major change of scale in both area and time I would still question whether this can be considered an extension. Thank you for providing a link to the original application and decision, documents that had not escaped my attention previously. As the ‘borrow pit’ was never used for the A11, the inclusion of this site into the SWMP seems to have been the end goal and so playing ‘a long game’ seems to be paying off for Elveden Estate.

As the purpose of MWLPs are supposed to ‘secure minerals and waste development that improves economic social and environmental conditions in the area’ what are the projected improvements for the Barnham area if the extraction is to be undertaken for 30 years? Mick George states that 20 jobs will be created. Are these jobs for local residents? If seasonal extraction is the only permissible extraction option to cater for the Stone Curlew breeding and nesting seasons, would these jobs also be seasonal? These questions remain unanswered, I plan making and site selection process SCC included the most suitable sites to meet the need for aggregates, and excluded sites that were unsuitable or had unacceptable impacts.

**Loss of agricultural tenancy**
To be clear, SCC does not consider the entire proposal to be a landlord tenant issue and must consider all material planning considerations, however the tenancy is a legal matter and not a planning matter.

**Environmental impacts**
The Plan together with the Site Selection Report and the Appropriate Assessment provide a reasonable assessment of the environmental impacts of the proposed development and outline the mitigation required at the detailed planning application stage so that there would not be a significant adverse environmental impact arising from this development.

**Noise**
Conditions similar to those attached to the existing planning permission will ensure that noise from the extraction, infilling and transport activities would no have a significant detrimental effect on local residents including school children.

**Lorries for backfilling**
The level of HGV traffic would be assessed as part of the consideration of the detailed planning application.

**Lorry routes**
A traffic management plan would detail the routes that most lorries would take except in the case of local deliveries.

**Highway safety**
Detailed proposals will be assessed at the planning application stage. The traffic would
still believe that as local residents will be significantly affected by this development and there have been no attempts to demonstrate how the economic, social and environmental conditions will be anything but damaged.

Has thought been given to the potential job losses that will occur due to the selection of this site? It is likely that the current tenants will struggle to farm North Farm if the Barnham site goes ahead as although I believe that they are ‘stakeholders’ they have not been included in discussions in regard to the restoration of the land. There does not seem to be a plan for it to return to agriculture, although contradicting statements were given at the consultation evening. The ‘inert backfill’ being suggested as a suitable replacement for the extracted material which could be farmed, yet Natural England stating that they are happy for it to be returned to natural heathland. I request clarification of this point, MAFF Good Practice guidance explains ‘the need to safeguard agricultural land for the needs of future generations’ is this not considered to be relevant here? This query has not been answered and therefore I request further consideration of this point.

Suffolk County Council maintains that this is an issue between the landowner and the tenant. Does Suffolk County Council not have a duty to ensure that aspects of the National Planning Policy Framework and the right for people and communities concerns to be heard as part of the planning process rather than washing their hands of them?

MWLP are also supposed to ensure that public amenities experience ‘no potentially significant detrimental impacts upon the enjoyment of residents’ homes or other sensitive land uses from HGVs, noise, dust, odours or visual impact’? The idea voiced by Suffolk County Council at the consultation evening was that residents would not be disturbed by the extraction which I refuse to accept. There will be a huge visual impact to locals who live in the area and use the byways for leisure and recreation from the large bunds that are proposed. Natural England produced an Access to Evidence Information note EIN018 in July 2016 which summarises ‘poor mental health represents the largest cause of disability in the UK and rates are on the increase … there is a growing body of evidence which tends to demonstrate a positive association between a) population level exposure to natural environments have to observe the rules of the road like all other vehicles. Most lorries would except in the case of local deliveries be routed away from local settlements.

Air quality
At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management’. If this is not the case then planning permission would not be granted.

Lack of detail
The plan is an in-principle document and relies on a broad-brush assessment of the likely environmental impacts. Much more detailed evidence is required at the planning application stage and is provided by the applicant. This information is then scrutinised by the County Council and their consultees such as the Environment Agency etc.

Roadside nature reserve
Part of the rationale behind the one-way weight restriction on the C633 is to protect the RNR. It is part of the highway and is therefore managed by SCC.

Climate change
Lorries are often the only option to transport sand and gravel. The use of the latest specification of lorries is therefore welcome.

Gas main
The alignment of the pipeline would be regularly checked.

Insufficient information
The information provided is sufficient to support the inclusion of the site in the Plan.
and b) individual use of natural environments, and a variety of positive mental health outcomes’ and that ‘the weight of evidence suggests that future policy and decision making should take account of the potential for good quality natural spaces in and around the living environment to promote better mental health.’ Has the mental health impact of the extraction, relating transport movements and loss of views when using the byways on the local community been analysed? The idea that large vegetated bunds will replace views of open farmland are ridiculous. They will be oppressive. If Suffolk County Council reserve the right to move public rights of way, might these be moved on to the tenant farmer’s land reducing the area they can farm even further? I request clarification of this point.

The consultation documents also document that additional mitigation will be required as the noise created by the extraction would still fall above the nationally allowed figures, therefore having a detrimental impact on the ability of residents to enjoy their homes. The proposed workings of the site are from 7am -7 pm Monday to Friday then 7am -2pm on Saturdays. How could this not have an impact on the local area? What form would this additional mitigation take? Would residents be consulted on these as well?

Who exactly decides what noise is ‘acceptable’ for 12 hours a day five days a week and 7 hours per day on the sixth? This level of noise will have a damaging effect on the physical and mental health of the residents.

Increased noise in the local area from either extraction or increased lorry movements will also have a long-term impact on the current and future students at both Barnham Primary and Elveden Primary schools. Shield and Dockrell explain in their 2003 article that in the past 30 years there have been many investigations examining the relationship between noise exposure of school children and their performance in various cognitive tasks. It is generally accepted that noise has a detrimental effect upon the learning and attainments of primary school children, with children with Special Educational needs being a double vulnerability group.

Exposure of young children to chronic road noise has ‘a particularly detrimental effect upon their reading ability,'
attention and long term recall’. Department for Education information reveals that Suffolk primary schools still remain below the national average in reading, maths, writing and science despite the Raising the Bar programme. I believe that the omission of any information about the noise impact of the extraction and resulting lorry movements of all types is unacceptable. When this was raised during the consultation evening at Barnham it was dismissed as ‘Elveden School has been there for over 100yrs so this will still be better than when the A11 ran past’ however, the children in Yr 4 and below at the time of writing will never have experienced the A11 running past the school. So I do not believe that this is a responsible or adequate response and is typical of the insensitive, intransigent and one might say cavalier attitude adopted during the whole of this consultation. WHO guidelines (1999) are that maximum noise levels are 35dB LAeq inside classrooms and 55dB LAeq in outdoor playgrounds. Could you confirm whether noise monitoring will be required as part of the proposal? If so, who will enforce this and pay for it for the 30 year lifetime of the extraction? This was not answered as part of the response process. I do not believe that lorry restrictions at drop off and pick up times are sufficient for safeguarding children’s health and educational opportunities.

Thank you for clarifying that the number of lorries is currently given as being 36 per day ‘however, it is possible that more lorries would be required for backfilling’. How many more? Would they be capped and have restrictions placed upon them too? Have these been included in calculations for air and noise pollution?

What route will those lorries take? Are they too going to be passing through Elveden village and past Elveden School? As this village and school is outside of the 250m area that Suffolk County Council is supposed to consult – are these residents and parents even aware of the proposals that will impact so greatly upon them? This question was not answered as part of the responses so I would still like an answer for this question.

I was not made aware of the predicted transport routes of the sold extracted material so am also concerned that additional lorries will be travelling eastbound along the C633 to the cross roads at Barnham to travel southbound to Bury St Edmunds.
The phrases in the response from Suffolk County Council of 'should not travel down the C633 as sand and gravel lorries would likely exceed this weight' does not fill me with any degree of confidence that this will not be the case. 'Should not' does not mean 'will not' and 'likely' suggests little monitoring of load weight.

As this road does not have a pavement, there is additional risk to pedestrians and children who walk to school, use Barnham Village Hall, or public transport. The crossroads already struggle with car and lorry volumes at peak times. Increased traffic and standing traffic will only cause more damage to the local air quality. Test results released on Clean Air Day 2018 suggest that children walking to school along busy roads are exposed to a third more pollution than adults, as their shorter height places them close to passing car exhausts. How are these impacts to be mitigated and monitored? Prof Jonathan Grigg, at Queen Mary University of London states 'my research has shown exposure of young children to higher amounts of air pollution from traffic has a major impact on their lungs. The UK government must take further steps to reduce toxic emissions' (The Guardian p22 21/06/18).

It is well documented that air pollution, including particulate air pollution is a significant cause of ill health and death. Public Health England states that ‘the increase in mortality risk associated with long-term exposure to particulate air pollution is one of the most important, and best characterised, effects of air pollution on health’ and that ‘current levels of particulate air pollution have a considerable impact on public health. Since writing my original letter, research by Dr Ziyad al-Aly of Washington University in St Louis Missouri, published in The Lancet Planetary Health shows ‘a significant link between air pollution and diabetes’ (i p5 30/06/18). In the UK 14,900 new cases of diabetes type 2 a year are caused by air pollution. The inclusion of this site will have significant health impacts on the residents of Barnham and the children and teachers at Elveden School.

Measures to reduce levels of particulate air pollution, or to reduce exposure of the population to such pollution, are regarded as an important public health initiative'. Figures
provided by Public Health England show currently that 5.4% of deaths in St Edmundsbury are attributable to air pollution. If this is the case, I would like to know the rationale behind exposing not only the local community to increased air pollution, but importantly two primary schools to increased levels of particulate emissions. There are currently 236 children on-roll at these schools, if the Air Quality Sensor in Newmarket is not going to be used to monitor air quality in the locality of the extraction and transport routes, where will a sensor be located? ‘A significant increase in local pollution concentrations is not expected’ is of little comfort to the residents who will be exposed to the dust and fumes six days a week. I believe failure to insist upon accurate air quality monitoring and enforcement throughout the length of the extraction could be regarded as negligence.

EPUK Guidance and the Suffolk Air Quality Management Group state in their publication ‘Air Quality Management and New Development 2011’ that air quality must be measured where proposals result in new signalling, where proposals result in an increase in vehicle trip generations within the local area, increased congestion, change in average speed by <10kph, a significant alteration to the composition of traffic, particularly vehicles over 3.5 tonnes, proposals in or close to sites with features sensitive to nitrogen deposition such as SPA, SAC, SSSI and RNR. I have not seen any evidence that this will be carried out, or who will pay for this monitoring. Please could you explain what procedures are in place for this to be undertaken and the costings of this for the length of the extraction process. Is this the responsibility of Suffolk County Council?

I would also like to see the air quality impact assessment projected forward for the length of the project both with and without the development using an appropriate model, MET data and technical guidance including LAQM T609 to ensure that all relevant emissions sources are included and that all relevant pollutants, including particulates and NO2 are included. This is considered by the Suffolk Local Authorities to be part of ‘three basic steps’. I believe that there have been NO2 monitoring studies completed in Suffolk, does data exist for areas where extraction has been undertaken and what are the noted impacts? The document also explains in paragraph 2.5.1 that
‘an impact assessment should be included for dust and contribution to PM10 levels for developments expected to take one year or more to complete. An impact assessment shall also be undertaken for mineral extraction and waste disposal and recycling sites’. Has this been done? To make an informed decision in this consultation process this information should be provided, and this document provides ‘minimum information to be reported in an Air Quality Assessment’ this is so ‘the assessment should provide a transparent account of the modelling undertaken’ has Suffolk County Council requested this information?

Suffolk County Council state in the responses that ‘at the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management’. This shows that Suffolk County Council acknowledges that there are concerns around the impact of this development on residents. Who decides that the ‘risk’ is ‘acceptable’? ‘Adequate’ suggests a half hearted ‘good enough.’ I find this response dismissive and as a parent, I feel as though the safety of my children’s health is considered valueless compared to a gravel pit.

A detailed report on the Environmental Impact of the proposed site has not been included in the consultation documents. How can the local community make informed decisions without full, easy to access reports? I would also like to know who provides the Environmental Impact Assessments and Ecological Surveys to ensure that they are truly independent and unbiased.

I am pleased to see that the text of the plan will now include the Roadside Nature Reserve (RNR) that runs along Elveden Road ‘Barnham (Thetford Heath) Roadside Nature Reserve No.15. This area would be directly impacted upon by the proposed extraction. As Suffolk County Council have highlighted that ‘rare Breckland Plants such as Purple Stemmed Cat’s Tail can be found on Barnham RNR’.

Suffolk County Council explain in the document that ‘by careful management of the sites we aim to preserve the species on RNRs, giving future generations the chance to enjoy these remnants of ancient grassland meadows’ has this area been
considered as it was not included in the consultation documents and I would like to know how this area will be protected and who will pay for the monitoring of any impact upon this area. This question has not been answered as part of the responses document.

I am also apprehensive about the Climate Change Mitigation information submitted as part of the consultation process. There are no specific carbon figures. Is it going to be more or less that the 3.5kg per tonne? Who is going to be accountable for measuring the impact of the extraction? Mick George states the use of ‘Adblue’ and ‘EuroVI engines’ but the VW scandal proves non-compliance and the loophole is unlikely to be closed until 2019 when this consultation period will be closed. I would still like my concerns about this to be noted.

Do the 12.5 metre easements on either side of the high-pressure gas main running through the site allow for potential shifting of sediments due to extraction or alteration of the water courses due to extraction? Would a survey of this be completed pre-extraction and risk assessments be carried out and shared with local residents?

To conclude, I believe that the consultation process is flawed and that there is not enough information for local residents to make truly informed decisions about the extent of the serious and long term impacts on a local area that includes two primary schools, Breckland SPA, Breckland SAC, Breckland Farmland/Little Heath/Thetford Heaths SSSI, Gorse Grassland CWS, Thetford Heath NNR, European Protected species (Bats and Great Crested Newt), Priority Species, Other Protected Species, Priority Habitats (Lowland Heath), two listed buildings, a site with known links to WW1, WW2 and the Cold War, the potential for the site to contain heritage assets of sufficient significance to trigger NPPF139 and need preserving in situ and within a Flood Risk Zone 3. I still believe that the inclusion of Barnham in the SWMP fails to consider the long-term, cumulative impact of a development on such a scale on the local community, particularly now that more industrial development and lorry movements have been approved since my original letter. These include an oil depot, plant hire depot and extended warehousing. The residents of Barnham are
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<tr>
<td>90766047</td>
<td>Miss Charlie Christensen, Planning Advisor, Environment Agency</td>
<td>Yes</td>
<td>Yes</td>
<td>The floods section in Policy MS2 does not address flood risk from all sources, in particular fluvial and surface water. There is a clear surface water flow path across the site as shown on the risk of flooding from surface water map. Flow paths should be protected to ensure flood risk is not increased. A very small part of the site is within Flood Zones 2 and 3. It is very close to the boundary of the site, but the impact of climate change will need to be considered. A Flood Risk Assessment (FRA) would be needed to demonstrate the risk of flooding to those working on site and to ensure that flood risk is not increased. Paragraph 9.27 states that Barnham is in a Groundwater Source Protection Zone (SPZ). However, this is under the 'Floods' heading. We are supportive of the reference to these constraints, however the issues of flooding and the location within a SPZ should be separated out. We would like to see either two separate headings, or a single heading named 'Flooding and Groundwater'. Although we note that restoration is not proposed, as the site is located within a SPZ2, and the Bretenham and Euston Safeguard Zones, we would not consider hazardous or non-hazardous restoration appropriate. A thorough hydrogeological risk assessment would be required before restoration that collects substantial baseline data. Strict Waste Acceptance Criteria (WAC) would also be applied to ensure the protection of groundwater quality. We would like to see this included as part of the Policy.</td>
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<tr>
<td>90772535</td>
<td>Mr Mike Jones (received via email), Conservation Officer, RSPB</td>
<td>No</td>
<td>No</td>
<td>The strategic planning requirements set out in NPPF paragraphs 109, 114 and 117 (see our comments on the Vision, Aims and Objectives) and the requirement of policy MP6, which states that 'preference will be given to restoration proposals that incorporate a net gain for biodiversity' and 'providing links to surrounding habitats is also encouraged', indicate that it is appropriate for the plan to include strategic guidance on the most appropriate restoration proposals. We would also recommend that in the course of revising the HRA for this plan, that revisions to site policies giving guidance to the most suitable forms of biodiversity restoration are an acceptable means of ensuring that the plan is effective and that sites can deliver any restoration proposals required under HRA.</td>
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Disagree, because the wording of Policies MS2 and GP4 adequately cover these issues. The accompanying Suffolk Minerals and Waste Local Plan Strategic Flood Risk Assessment also indicates that none of the site is within flood zones 2 and 3.
In addition, minerals extraction on this site, within the Breckland SPA, will result in an adverse effect on the integrity of the SPA through displacement of nesting birds, and without mitigation would not be permissible at the development control level, leaving the plan undeliverable.

For this site, we recommend that as an absolute minimum the following are incorporated into the site policy and/or supporting text where appropriate.

- Provision of alternative habitat for displaced SPA features for the period of the extraction. Whilst the proposed allocation is temporary, it will result in a loss of SPA habitat for a significant period, and this should be mitigated for by provision of suitable nesting habitat elsewhere for the period of the works.

- Restoration to wildlife-rich habitats. In line with existing minerals consents in the SPA, restoration of mineral sites within the stone-curlew habitat of the SPA should be to Brecks grass-heath, the preferred habitat of stone-curlew, in order to maximise the likelihood of the SPA species returning to use the site after the minerals working.

- Given the proposed allocation’s location within the SPA, any allocation must be able to demonstrate that it will be able to avoid any significant increases in pollution to the surrounding site, from sources including (but not necessarily limited to) dust, noise, lighting, human and vehicle disturbance on site and on access routes and changes to the surrounding hydrology.

- We expect that such measures would also apply to any similar international designations (such as Ramsar sites and SACs) and also include similar measures to avoid adverse effects on Sites of Special Scientific Interest.

- If the above is possible and the sites are taken forwards in the plan, then they should be included as site specific policies in the submission stage of the plan, and accompanied by the appropriate level of detailed assessment in a revised HRA.

90820325  Amy Wright (received via email), Senior Planning

It is understood that SCC is the minerals and waste planning authority for Suffolk. SCC will liaise with its own internal departments on the Pre-submission Local Plan as the Highways Authority and the Local Lead Flood Authority.

Following the submission draft consultation the plan HRA has been revised in relation to the recent European Court of Justice ruling "People Over Wind". This has also been subject to public consultation.
Policy Officer, West Suffolk District Councils

Barnham (sand and gravel site - proposed extension to an existing quarry) – current map ref SB1, site ref M2. This is a sensitive location within the Brecks. This site is located within Breckland SPA and adjacent to Breckland SAC. It is noted that a Habitats Regulations Assessment has been undertaken. SEBC and FHDC are concerned the likely significant effects appear to have been screened out for this site without justification and reliance has been placed entirely on a project specific HRA. The potential for in-combination effects should also be considered and you may wish to consider proposed development allocated in the adopted SEBC Vision 2031 documents and in the FHDC Proposed submission SALP (as modified). The potential for other ecological and landscape effects does not appear to have been considered in any detail at this stage.

West Suffolk Councils response to the Pre-submission SCC W&MLP Consultation, (July 2018).

It should be noted that there have been concerns from the Parish historically in relation to HGV traffic routing in proximity to the primary school, and B1106 crossings, and that this is referenced in para 9.8 and specific Policy MS2 (within Chapters 7 to 17).

Air quality is to be considered within an Air Quality Assessment within a future planning application, (para 9.24, supported by Policy MS2 (k)). Noise too will be considered at planning application stage (para 9.25) although for consistency this should also be reflected in a policy requirement.

SCC are aware of community concerns regarding HGVs routing near to Elveden School. As a result of consultation SCC included part “c” of policy MS2, which states that proposals must adequately address highways safety, and amenity impacts on the school as a result of HGVs.

Noise mitigation is a policy requirement under Policy MS2.

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89020261

Mr Ken Jordan (Received by post)

No No No

1. It uses the ‘existing’ gravel pit as a starting point. That pit has never been used and the permission was gained under false pretence.
2. The Water table will be severely affected.
3. The SSSI area will suffer.
4. Noise pollution will affect the village which lies to the west of the proposed site.

Modification? Reject the application outright!

1. The planning permission for the existing part of the site has been implemented as evidenced by the bund.
2. SCC recognises that this site is within a Ground Water Source Protection Zone (SPZ). Policy MS2 requires that a planning application submitted must include assessment of the implications for groundwater and propose mitigation to address these issues.
3. Detailed assessments of the potential ecological impacts of the site must be submitted as part of the planning application.
and these must inform measures to adequately mitigate these impacts. This includes assessing and mitigating designations such as the SSSI. Additionally, a restoration scheme that satisfies SCC must be submitted as part of the planning application and it is currently expected that this site will be restored to primarily agriculture. The site is larger than that which is currently permitted, however the site will be phased, meaning that not all of the site will be extracted at once. Extraction will occur in phases and before a new phase can be extracted, restoration will need to begin on the previous section of the quarry.

4. Assessments of noise impacts and provision of appropriate mitigation are required under Policy MS2. At this stage, SCC Noise Consultants identified that an additional standoff area may be required, in addition to standard mitigation, to protect the amenity of nearby residences.

I am writing to express my concerns regarding the proposal to use the site at North Farm as part of the planned gravel extraction under the Minerals and Waste Plan for the area. There are various grounds on which these concerns are based and these are articulated below.

CONSULTATION PROCEDURE

At the Minerals and Waste Consultation held in Barnham, it became apparent that the consultation process was far from comprehensive. We were told that all those residing close to the proposed site had been written to and their views sought. When I queried this, as we had not received any such communication despite being one of the closest houses in the village to the site, we were referred to maps that had been used to determine those who would be affected. Surprisingly our house (Gorran Haven, 2, Station Field, Station Road) was not depicted on the map. The house was constructed around 2000 and so this would indicate that maps being used for the consultation were significantly out of date and clearly incorrect. This may, of course, be a one-off error but clearly raises doubts as to the overall accuracy and thoroughness of the consultation
process. How many other such errors have occurred and remain undiscovered?

STATUS OF THE SITE
From my researches it is apparent that the original decision to grant permission for gravel extraction was a very close decision and was swayed by the assertion that end users had been identified for the gravel. This included its use for the dualling of the A11 which would have benefited the local community. However, no gravel was ever extracted which brings into question the genuineness of the claim of existing end users. Being charitable this might be construed as a mistake and there was intent to supply as indicated. Being a little less understanding it could be taken as a cynical ploy to bolster an otherwise losing case. I believe that the gravel from the site was not of suitable quality for use on the A11. If that was the case, how could the supply for this purpose have been considered. Were no tests carried out to establish the suitability, and if not, why was planning permission granted? In any event, this should call into question the correctness of the decision to grant permission and the opportunity to rectify this should now be taken.

ECOLOGICAL
The site is unsuitable from an ecological perspective. It is a designated area of SSI and there are many vulnerable species that will be affected by the proposed extraction. With the original 2 application, mitigation was proposed. This should not be simply accepted second time around as the extent of the site and the duration of the extraction are both now greater. A fully independent analysis of the current state of the vulnerable species should be undertaken, not based on the reports of those with vested interests, and judgement made as to whether a 20-year duration disruption to their habitat can be mitigated to a degree where their status is not threatened further. If not, then the site should be excluded from the Mineral and Waste plan.

ENVIRONMENTAL
If the site is allowed to go ahead, the result will be to adversely affect the local air environment. There will be increased noise pollution as a result of the operation of heavy machinery on site and the vehicles used to transport the extract away from the site. Proper investigation into the planned extraction needs to be carried out and its impact on the unique character of the local environment assessed rather than adopting a “one size fits all” approach by relying on standard 2016, the most up to date available at the time. During the Issues and Options Consultation there were some missing properties identified during the preferred options consultation, and added to the map on page 55 of the document before the Submission stage consultation. SCC would welcome any additions to make the map of the site and surrounding area more accurate.

Status of the site
It is the case that the initial permission for this site was related to specified end users (the A11 bypass), however the decision of whether or not to use this material was a commercial decision outside of the control of the County Council. The extension is included in the Plan because at this stage it is considered acceptable in principle, subject to the criteria set out in policy MS2 of the plan.

Ecological
Detailed assessments of the potential ecological impacts of the site must be submitted as part of the planning application and these must inform measures to adequately mitigate these impacts, before the granting of planning permission. These requirements are outlined in policy MS2 part “j”. One of the measures that has already been identified as necessary is seasonal working to avoid the Stone Curlew nesting season. Additionally, a restoration scheme that satisfies SCC must be submitted as part of the planning application and it is currently expected that this site will be restored to primarily agriculture. Ecologists at SCC were consulted regarding the suitability of including the site within the plan.

Air quality and noise
Policy MS2 parts “k” and “l” are intended to address air quality and noise concerns respectively. An air quality assessment will be required to identify potential impact of
procedures. The Breckland is a unique and fragile environment and deserves to be treated as such. The dust created by the extraction will undoubtedly spread due to the prevailing winds and this will carry it toward the village of Barnham. The effects of this will be to reduce the air quality for the locals over and above the damage caused by the amount of heavy traffic on the unsuitable C633. The bunds that are already in existence and any added in future are a visual pollution of the location. Placing these in an area of natural beauty is unacceptable and will destroy the visual amenity that has been enjoyed by those who have chosen to live nearby and by those who are passing through.

SUMMARY
For all of the above reasons the site should be excluded from the Minerals and Waste plan and planning permission for a quarry should be withdrawn. The requirements for sand and gravel should be reviewed in the light of this and, if necessary, alternative sources identified and incorporated into the plan.

2nd Rep:
I am writing in response to the second consultation for the Suffolk Minerals & Waste Consultation. However, before detailing my response to this I am compelled to express concerns about the first consultation. I responded to that on 10 December and I have attached a copy of my response with this letter. In that response I highlighted the fact that we had not been informed of the consultation and that our house did not appear on the map that was being used as part of the consultation process. As we are one of the nearest residential properties to the proposed extension to the development area we would have expected to have been consulted and kept informed of the process. I also went on to list my concerns regarding the proposal to extract from the Barnham site. It came as a considerable surprise to me, when I looked at the Suffolk County Council response to the consultation, to find that there was no record of any of my concerns. There were many other detailed responses from other concerned local residents included but, despite my having highlighted the fact that I had not being consulted or informed in the first instance, my representations had been completely ignored. This is completely at odds with the policy espoused in the Suffolk County Council’s Statement of Community Involvement (SCI) which states that ‘All stakeholders will be consulted with including local communities and liaison groups, industry bodies increased dust and pollution. This assessment must then be the basis of any mitigation of any mitigation and monitoring to minimise the risk of nearby residents and businesses. Assessments of noise impacts is required. At this stage, SCC Noise Consultants identified that an additional standoff area may be required, in addition to standard mitigation, to protect the amenity of nearby residences.

Size of site
The site extension is significantly larger than that which is currently permitted, however the site will be phased, meaning that not all of the site will be extracted at once. Extraction will occur in phases and before a new phase can be extracted, restoration will need to begin on the previous section of the quarry. This is to help minimise and mitigate the impacts of the quarry operation, including, ecological, environmental, and human health.

Lorry movements
The description of lorries abilities to use the C633 in the issues and options response to representations was correct. Lorries over 7.5 tonnes are prohibited from travelling eastbound along the C633 although it is also correct to add that all lorries are prohibited from travelling westbound. The eastbound restriction was the part identified in the response to representations, because of the local concern about lorries coming from the quarry to the west of the C633, travelling eastbound. The weight limit is identified on the Suffolk Lorry Route Network map, which can be found here: https://www.suffolk.gov.uk/assets/Roads-and-transport/lorry-management/Lorry-Route-Map-Amended-MAY-17.pdf
and ‘hard to reach/marginalised’ groups (including ethnic minority groups, teenagers and the elderly).’ It also suggests that the ‘great emphasis on transparency in planning processes, inclusiveness and commitment’ are merely nice words which are not backed up by any sort of meaningful action.

I therefore find myself in a position where I have little trust in the processes that the Council claim to be following. Indeed, it crossed my mind that it was not worth the effort to submit a second response after my first response singularly failed to make it past the starting post. This may be a little paranoid (although, given the circumstances I have outlined that is not an unreasonable position!) but I have nevertheless decided to proceed and would request that I receive an individual response to my letter as reassurance that my concerns will be taken in to account this time. At the very least I would request an acknowledgement from you that my letter has been received and my concerns will be given due consideration this time.

As I have already indicated I am forwarding my original letter as my concerns expressed there are still extant and, to the best of my knowledge, have not been addressed. As such they should be considered as part of the responses to the second consultation. There are also additional concerns that I have as a result of the second consultation and also as a result of considering the Council’s responses to the first consultation.

Further to my original comments regarding the status of the site where planning permission was granted in a close vote which was swayed by the claim that the extracted materials would be used for the dualling of the A11 (something which was of benefit to the local community) I must highlight the massive increase in scale of the operation that the extension requested for the Minerals & Waste Local Plan represents. The original permission was for 3 years finishing on 31 October 2015. No material was extracted from the site despite the claim that it was required for the A11 project. Having gained a foot in the door a variation was then sought which attracted far less attention than the original proposal and an extension was granted for a further 4½ years. There was still no extraction during this time. Now further extensions are being sought which will significantly increase both the area of the site and the duration of the extraction with no benefit of any kind to the local community. What was a relatively small area being extracted from for a duration of 3 years has become a much larger area...
with extraction over 3 decades. At best this can be regarded as a failure of the process to safeguard the interests of the local community and at worst a cynical manipulation of the planning process by a wealthy and powerful organization to circumvent the measures put in place to protect individual's interests in such circumstances. The site should be removed from the plan if any consideration is given to those who will suffer in the event of such large-scale extraction being permitted.

LORRY MOVEMENTS
The council's responses to the question of lorry movements are a little confused. At one point when addressing concerns that there might be increased traffic at a known accident spot (Barnham Crossroads) the response claims that: "The road towards the Barnham Crossroads (Elveden Road) from the lorries' entry point onto the highway has a weight restriction of 7.5 tonnes, which sand and gravel lorries would likely exceed, so lorries from the quarry should not use this road." There is a restriction on the road but it is in the direction from Barnham Crossroads and not towards it. Lorries over 7.5 tonnes are permitted to travel Eastwards along the C633 under the existing TRO so this response is incorrect and misleading. Moreover, the current levels of HGV traffic are causing considerable damage to the carriageway of the C633 which in turn is causing problems for local residents through damage to vehicles and difficulty in negotiating the damaged sections of road. The damage to the carriageway has been reported and there is at least one unresolved claim for damage to vehicles. The current TRO is also ineffective at preventing larger vehicles from travelling West along the C633. There are regular infringements which are reported. The response is a "slap on the wrist" for the haulage firms with no meaningful sanctions being applied. This has no long term deterrent effect and lorries continue to flout the regulations. There is every reason to assume that this sort of behaviour will be continued by the drivers of the vehicles associated with the extraction site. In the absence of effective policing and sanctions what incentive is there for them to comply with imposed conditions?

AIR QUALITY
At numerous points in the responses the council states that: "At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable." This appears to be pre-judging the outcome of such an assessment and does little to inspire
confidence. By stating that it will identify the measures necessary to make this risk acceptable, it has already precluded the possibility that the air pollution risk may be found to be unacceptable. What will happen if the air pollution is deemed to be a severe risk and there are implications for the health of local residents? Unless the decision is a foregone conclusion, how can the council be this certain that they will identify measures that make it acceptable?

ECOLOGY
Numerous objections were raised regarding the effect of the extraction on local flora and fauna. In particular the effect on birdlife was identified with the proposed site being a breeding location for, amongst others, Stone Curlews, Nightjars, Woodlarks. The blanket response to this has been: “Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time.” This may be true or it may not (I note the use of the conditional tense in the response). However, the fact is that any disturbance to, or in the vicinity of, a nesting area cannot fail to have an impact on the ability of the birds to breed successfully. Phased or not, there will be a resulting disturbance to the birds preferred habitat and their reaction to this cannot be predicted. The fact that the extraction is now proposed to continue for 30 years means that any impact is going to be much more long term and potentially devastating for the populations concerned. This must also be placed in the context of the fact that the population data is as reported by the landowner. Unless a full independent survey is carried out by a recognised authority, the data on which any conclusions are based will always be suspect. The land owner and beneficiary of the extraction should not be the one who also controls the data on which decisions are based.

NOISE POLLUTION
In the response the council has stated in several places that: “County Noise Consultants state that a standoff in addition to standard mitigation may be required. This will be identified at the planning application stage.” For those living within a distance where this is going to affect them it will be impossible to produce a large enough “stand off” to mitigate the noise pollution. This is evinced by the fact that noise pollution was an issue when there was a factory at the Trimay industrial site. Indeed the noise from the factory was still an issue despite the significant amount of woodland between the factory and those
affected. A stand off may well be required but will prove ineffective, irrespective of what County Noise Consultants may state. The distance of the factory from the nearest houses is considerably greater than the proposed extraction site and no amount of bunding will reduce the noise to an acceptable level but it would have a significant impact on the visual amenity of those who live in and/or make use of the area for recreation and relaxation. This is something that the Minerals & Waste Local Plan should actually prevent rather than facilitate.

CONCLUSION
For all of the reasons outlined in my original letter dated 10th December 2017 and those above, the Barnham site must be excluded from the Minerals & Waste Local Plan.

89707766
Mr Timothy Colyer
- No -
The proposed workings at Barnham are in a water protection zone close to the Barnham Cross borehole which is one of the three main water supplies for Thetford, Norfolk. Please refer to ’Thetford Water Cycle Study Final Report May 2008’ Section 6: Water Resources and Water Supply Baseline Assessment. This report was commissioned by Breckland District Council as part of the planning process for a major expansion of Thetford, a town with very limited options for its water supply. Has Suffolk County Council informed Breckland District Council and Thetford Town Council that its proposed quarry at Barnham will interfere with the aquifers that supply the Barnham Cross borehole and could affect the viability of their expansion plans for Thetford? Was a thorough investigation into the possible disruption or contamination of Thetford’s water supply carried out and published before Barnham was placed on the preferred options list? If not, the consultation on the Barnham proposal is seriously flawed.

The Barnham site should be removed from the preferred options list until the effects of the workings on the water supply to Thetford have been fully investigated and Breckland DC and Thetford TC are fully satisfied that their development plans will not be compromised and that Thetford’s water supply is secure.

SCC recognises the groundwater source protection zone in Policy MS2, which outlines the Barnham quarry allocation and so states the criteria the site must meet in order to be granted planning permission. One of these criteria, in part “n” of the policy, is the implications for the groundwater source protection zone. any potential impacts will need to be addressed before the granting of planning permission. Breckland District Council, Thetford Town Council and Norfolk County Council were consulted, as was the Environment Agency who provided advice on groundwater implications.

89925961
Mr Simon Ford
Yes No Yes
Re Proposed Barnham Quarry, Given where Barnham is situated, there is no suitable route for HGV traffic to use to get to the majority of Suffolk as there is not a junction from the A11 to A14. This will force HGV traffic to use C633 through Barnham village or the B1106 through West Stow; this has the potential to damage these small roads (who will be responsible lorries should not go through Barnham Village with the exception of local deliveries. Dump trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed by the developer is
for repairs). The lorry route will also be passing the local school. Due to the position of the proposed quarry in relation to Barnham village, this will be directly in line with the prevailing wind, hence bringing dust and noise across the village. This can be demonstrated by a noise and smell issue from a company operating at Little Heath Barnham in 2016. The current landscape is next to a SSI and as such is used by lots of wildlife and is also a great beauty spot, what will this look like for the next 30 years, can the current wildlife withstand this time period of disruption. We are not convinced that the replacement after the quarry has moved will reflect the existing area; this will become a “sterile” landscape. Adjacent to the proposed site is a spring, what guarantees are there that this will not become disrupted and /or polluted. Can the working hours be restricted to 9 – 5 Monday to Friday, weekend disturbance is NOT acceptable.

we would not consider this site as approrate as detailed in section 5
to take the lorries onto the B1106 where they will access the wider haulage network.
Regarding the school, for safety lorries can be restricted from passing the school during busy periods, such as the beginning and end of the school day, when children are being dropped off and picked up. A condition requiring this was applied to a previous planning permission at this site. At the planning application stage, detailed assessments for both air quality and noise issues, which will allow mitigation measures to be identified, which would reduce impacts on nearby residents and businesses to an acceptable level. At this current plan making stage it is expected that these mitigation measures could be provided. Ecology and Landscape impacts would be minimised by site phasing, which ensures that only part of the site is worked at a time. It is expected that this site would be restored, primarily, to agriculture. Appropriate surveys which inform other ecology and landscape mitigations will also be required, and the restoration scheme. The ecological and landscape designations related to this site must also be considered. Any restoration scheme will need to satisfy SCC before planning permission is granted. Regarding the water quality, an assessment of the ground water and flood risk will need to be submitted as part of any planning application as the site is within a Groundwater Source Protection Zone. Working hours for quarries are usually 7am to 6pm Monday to Friday and 7am to 1pm on saturdays, however these can be altered by condition in specific circumstances. For example, site will be worked seasonally, to avoid the Stone Curlew nesting season.

90558789  Mr & Mrs Ian & Jackie Clarke (received via email)  -  -  -  My wife and I would wish to object most strongly to the possible extension of the existing permission to extract sand and gravel at Barnham and would urge that this site be removed from the above plan.

Detailed assessments of the potential ecological and landscape impacts of the site must be submitted as part of the planning application and these must inform measures to adequately mitigate these impacts. It must be shown that
The proposed extension is within an area designated as an SSSI, as an SPA and it also lies within the area covered by the Brecks Partnership. SSSIs and SPAs are well known designations, but the Brecks Partnership less so, but suffice it to say that the area is steeped in history dating back to early man and contains wildlife and plant species found nowhere else in the UK. More details of the history and heritage of the Brecks can be found at [www.brecks.org/about/history-and-heritage](http://www.brecks.org/about/history-and-heritage), while more information about the wildlife and plants resides at [www.brecks.org/about/wildlife-in-the-brecks](http://www.brecks.org/about/wildlife-in-the-brecks).

The environmental damage that this proposed extraction site could cause if permission for it was granted, should be sufficient reason in itself, we believe, for this proposal to be withdrawn from the Draft Local Plan Consultation document. We could go into greater detail about our various objections to this scheme, which include the fact that there are no details of where any washing and grading plant might be located, the proposed haul route is likely to cause considerable damage to the paths, byways, fauna and flora along its route and the school at Elveden would likely suffer from increased noise and dirt, thus affecting the health and welfare of its young pupils.

What does ‘Special Protection Area’ mean? Surely it means what it says! Please remove this site from the plan.

The location of the site machinery will likely be in the currently permitted site, however it is possible this could change in subsequent planning applications. Potential impacts to Elveden School will also need to be addressed, as set out in Policy MS2.

<table>
<thead>
<tr>
<th>Reference</th>
<th>Name/Email</th>
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<tr>
<td>90678976</td>
<td>Mrs Denise Colyer</td>
<td></td>
<td></td>
<td>Who in their right mind would allow quarrying operations on a site crossed by a nationally important gas main? Find a more suitable site.</td>
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<td>90739639</td>
<td>Cllr Joanna Spicer (received via email)</td>
<td>Yes</td>
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The consultation showed considerable concerns about the impact on nature conservation and this should have been tested with experts. There were regrettable omissions in who was consulted including the Ministry of Defence as adjoining landowner, the owner of the industrial estate, Elveden School and the British Trust for Ornithology. The proposal is referred to as Barnham "quarry" when in fact there is no quarry or excavation. 15 hectares has had consent for a "borrow pit" for two designated end users. This consent will soon expire and is currently subject to a further application but this time with no end user. Should this consent be granted then I recommend that only the 15 hectare site be included in the final plan. However, in view of the environmental impact I recommend that the Barnham site be removed from the draft Suffolk Minerals and Waste Local Plan. It is the case that the initial permission for this site was related to specified end users (the A11 bypass), however the decision of whether or not to use this material was a commercial decision outside of the control of SCC. In planning applications following this it was decided that the sites use as a quarry would still be acceptable, without the specified end user. The extension is included in the plan because at this stage it is considered acceptable in principle, subject to the criteria set out in policy MS2 of the plan. Local residents and statutory stakeholders have been consulted, for each planning permission of the existing site, and through each stage of the plan making process. SCC responded to representations made by the public and made changes to the plan based on these representations.

With regard to the inclusion of the proposed 'Barnham Quarry', I believe there has been systemic abuse of the planning system by the original applicant and a complicit council planning department. The original application and subsequent approval of the Barnham site was as a 'Borrow pit' solely for the purpose of constructing the A11 bypass around Elveden. This was passed despite being a wholly speculative application as there was no possibility that the material quarried would be used as a sub base layer for the new road. In Suffolk County councils own minerals plan it states that roads are built from imported stone (from the East Midlands) as Suffolk has none of the suitable material. So clearly an ulterior, speculative plan was in place aided and abetted by the Suffolk councils planning department. Although local residents suspected such a plan they weren't able to comment on what may happen in the future but a highly speculative plan was allowed. This makes the local plan unsound and suggests that the planning department and applicant didn't co-operate with local residents or statutory stakeholders.
The Barnham site wouldn't have been considered without the prior consent of the 'Borrow pit' because it's a Special Protected Area, SSSI, sited on a significant aquifer, home to the endangered Stone Curlew and has private infrastructure, power lines and an important high pressure gas main running through it. The original application was a sham with only the long term goal of getting the Barnham site in the minerals plan. It makes a mockery of the SPA and SSSI designations.

The Barnham site should be removed from the minerals plan. The loophole which has allowed the Barnham site to get this far within the minerals plan process should be closed. There is little point in having SSSI's and SPA's if minerals plan can outscore them.

Wildlife designations and features such as groundwater do not necessarily mean that sites cannot be considered for sand and gravel extraction, but impacts on these must be assessed and appropriate methods to minimise and mitigate impacts must be proposed before planning permission can be granted. For example mitigation for quarry impact on the Stone Curlew will be to have seasonal extraction, which avoids the nesting season. Other sites within the plan also have groundwater and wildlife implications, which must also be appropriately addressed.

Regarding the gas pipeline, the National Grid have been consulted and provided advice at the preferred options stage, stating that extraction was acceptable, provided that the 12.5m on either side of the pipeline are undisturbed. Power lines across the site can be avoided or diverted.

Suffolk County Council have conducted an inadequate site selection procedure that has not covered the many issues surrounding a 30 year, 2.5 million tonne quarry that might encompass over 100ha, instead relying on existing assessments made for a 18 month borrow pit.

The site is crossed by powerlines and a gas main; the site is liable to flood in high water table conditions; the use of farm tracks to transport material is impractical; The site borders a nature reserve and lies within Breckland SSSI summer extraction will not be permitted so as not to disturb stone curlew activity: Barnham is not a viable site for a sand and gravel quarry. Suffolk County Council’s statutory requirement to retain 7 years of predicted sand and gravel demand can be achieved within existing sites and/or co-operation with neighbouring authorities, there is no need to adopt any new sites in the SMWLP. Barnham is a new site, not an existing quarry, to imply that by forming a screening bund constitutes a quarry is a folly of the planning system. No sand or gravel has left the site it is not an existing quarry.

Information from the initial permission included in the site selection process, however SCC undertook further assessment, including site visits which took into account the full quarry area. Additionally before planning permission can be granted assessments of a number of potential impacts and appropriate mitigation measures must be proposed before the site can be granted planning permission.

The site extension is significantly larger than that which is currently permitted, however the site will be phased, meaning that not all of the site will be extracted at once. Extraction will occur in phases and before a new phase can be extracted, restoration will need to begin on the previous phase of the quarry. This is to help minimise and mitigate the impacts of the quarry operation, including, ecological, environmental, and human health.
| The proposed development at Barnham should be wholly removed from the SMWLP as it is not necessary to include this new and impractical site. | Regarding the gas pipeline, the National Grid have been consulted and provided advice at the preferred options stage, stating that extraction was acceptable, provided that the 12.5m on either side of the pipeline was left undisturbed. Power lines across the site can be avoided or diverted.

Criteria in policy MS2 require the planning application to assess and address the impacts on wildlife designations, wider ecology, groundwater and flooding. In respect of the Stone Curlew, it is required the site does not operate during the nesting season, this does not necessarily mean the site is not viable. Other sites in Suffolk operate, while managing impacts on Stone Curlew.

While the plan does allocate sites for an over provision of sand and gravel during the plan period, this is considered necessary in order to provide flexibility. This is needed in case one or more of the allocated sites do not come forward within the plan period, unforeseen constraints found at the detailed planning application stage limit the amount of sand and gravel that can be extracted from a site, or there is an increase in demand for sand and gravel. This is possible as there is a greater focus in government policy on housing delivery and Suffolk currently has a lower rate of delivery than planned (as outlined in the Local Aggregates Assessment).

While sand and gravel has not been extracted from the site, the site still has lawful use as a quarry, which has been implemented as defined in the Town and Country Planning Act 1990 section 56.

There is no reason why the proposed haul route could not be utilised. |
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<tr>
<th>90927621</th>
<th>Squadron Leader Peter Holland (received via email), Director</th>
<th>Yes</th>
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<td>Whilst I fundamentally object to the Quarry and have done from the outset, my main concern is that ‘inertia’ will prevail and with this a very poor deal for all those in Barnham and the surrounding area. I know that we have to be robust and scientific in our responses and look to the council, who will have the expertise, to ensure these constraints and provisos are made clear within the contract. Otherwise, I feel like there is an express train coming towards us, ‘a force of nature’, that we can do nothing to prevent or mitigate. Having dealt with contracts in the Public Sector before, I am aware of the challenges of policy interpretation, intent versus reality, the gamesmanship that private companies can employ and the subjectivity still remaining. I spoke to one of the Council Operators at the number on your website this morning to confirm that I can email this to you; I can also provide you with a signed copy, as required. Thank you for the opportunity to voice my concerns. The entirety of the plan is unsound. - Particulates (respirator-able 10um), further increased by the extension, the percentage of sound and chemistry of particles. - Noise levels, as above, affected by the predominant wind direction. - Indirect effects on water table and flooding, we are above an aquifer. - Social effects and amenity of villagers. - Increased traffic in the area with inherent noise, risk ect. There are a myriad of scientific papers on this and the solutions to it, which I would assume all parties are familiar with. I do not wish the quarry be permitted on this area at all. Overall, what are the merits to prevent my points at para 5? How are these measured contentiously? Importantly, how are these constraints maintained and what are the punible measures for non compliance. The private sector is often best placed to out manoeuvre strained local resources and people. I submit this to prevent the above and the ensure fairness to all those affected.</td>
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<td>Policy MS2 outlines a number of criteria a planning proposal must address before planning permission can be granted on the site. Policy MS2 parts &quot;k&quot; and &quot;l&quot; are intended to address air quality and noise concerns respectively. An air quality assessment will be required to identify potential impact of increased dust and pollution. This assessment must then be the basis of any mitigation of any mitigation and monitoring to minimise the risk of nearby residents and businesses. Assessments of noise impacts is required in order to achieve the same outcomes and prevent the quarrying from being a statutory nuisance, protecting the amenity of nearby residents. Part &quot;n&quot; of policy MS2 is included to address the ground water issues (the site is above a Groundwater Source Protection Zone) and flooding. These will need to be addressed before the granting of planning permission. The Environment Agency were also consulted and responded with advice regarding the Groundwater Protection Zone. Lorries will not go through Barnham Village, except in the case of local deliveries. Trucks carrying the material will be travelling through the Elveden Estate to Contact Farm on the old A11, where material will be loaded onto lorries. The route proposed by the developer is to take the lorries left at the crossroads onto the B1106 to Brandon, where they will access the wider haulage network via the A1065. Policy MS2 also requires that maximise highways safety and and minimise amenity impacts of lorries to Elveden School. and the provision of traffic lights in order to manage traffic where the haul route crosses the B1106.</td>
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11. **Belstead**
## POLICY MS3

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<tr>
<th>Reference Number</th>
<th>Respondent</th>
<th>Legally compliant?</th>
<th>Sound?</th>
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<tr>
<td>89309859</td>
<td>Mr Mark Fletcher</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>It will destroy our village, our properties, our community</td>
<td>Policies MS3 and GP4 are in place to protect residential amenity and avoid or mitigate significant impacts.</td>
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<tr>
<td>90762482</td>
<td>Mr Tom Hill, Chairman, The Stour and Orwell Society</td>
<td>No</td>
<td>No</td>
<td></td>
<td>This is a strange site to include; we assume the result of a recent sale by the longstanding farming owners. It forms part of a highly attractive and visible mosaic of farmland and ancient woodlands on the southern approach to Ipswich and its working for minerals would set a highly undesirable precedent. It is unclear what level of discussion there has been with Babergh DC about its recently canvased housing options nearby.</td>
<td>Policy MS2 outlines details to protect important habitat and landscapes features and habitat. Woodland and ancient woodland around the site and wooded tracks are expected to be retained, leaving an appropriate distance between the edge of the tree canopy and the start of the extraction area. Policy MP6 requires progressive working and restoration of the site. SCC and Babergh District Council have been in discussions regarding the Minerals Local Plan and the Babergh Mid Suffolk Joint Local Plan as they both develop.</td>
</tr>
<tr>
<td>90740351</td>
<td>Mr Steve Merry (received via email), Transport Policy and Development Manager, Suffolk County Council</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>In the LHA’s opinion Paragraph 10.5 should include the term safe and suitable access shall be provided. In the LHA’s opinion the C495 Chapel Lane / Swan Hill through Copdock and Washbrook is not suitable for significant volumes of HGV traffic but accepts that this can be controlled by a suitable Lorries Management Plan. Paragraph 10.19 should note that the proposed access follows line of Bentley Bridleway 064 and that the site is crossed by Belstead Footways 025 and 026 and Copdock Footway 015.</td>
<td>Disagree. Policy MS3 a) already makes reference to establishing a quarry access onto the A12 and traffic management to avoid local villages. Clause H) already refers to the requirement to safeguard or divert public rights of way.</td>
</tr>
<tr>
<td>90766180</td>
<td>Miss Charlie Christensen, Planning Advisor, Environment Agency</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>This Policy could be enhanced by noting the watercourse in the northern section. We would not want to see this impacted, or its flow or surrounding habitat affected in any negative way. During the extraction of sand and gravel we would wish to see an adequate buffer zone left entirely unaffected. Some research may be needed to determine how large this should be to protect flows and avoid impacts.</td>
<td>Disagree. Policy MS3 part “i” already requires that planning applications should assess and address implications for the “groundwater source protection zone and controlled waters”, which includes the watercourse to the north of the site.</td>
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<tr>
<td>ID</td>
<td>Name</td>
<td>Action</td>
<td>Issue</td>
<td>Response</td>
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<tr>
<td>90890497</td>
<td>Mr Duncan Clarke</td>
<td>Yes</td>
<td>Me and my neighbours properties are served by a well for domestic water. By digging a quarry down hill from my property, the water table will be lowered considerably. This will exacerbate the already falling water table as evidenced by the fact I am losing trees from my orchard due to lack of water due to dry weather. Who will pay to supply water to our properties. The effects of digging this quarry will damage/lower the water table in the area. Needs to be assessed and measures put in place to connect our houses to a mains supply if this happens.</td>
<td>Policy MS3 part &quot;i&quot; requires planning applications to assess for potential impacts on ground water sources. If any impacts are identified at this stage, mitigation will be required to address these impacts.</td>
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<tr>
<td>90890515</td>
<td>Mr Duncan Clarke</td>
<td>Yes</td>
<td>There is no provision to prevent the quarry trucks or the extra traffic caused by these extra trucks using Church Lane as a short cut when the Copdock A12/14 roundabouts is chocked up as happens every morning &amp; every evening, often backed up past the Capel St Mary turn off. This road is a single carriageway road with passing places overhanging branches and power and telegraph cables. This rat run is a back way into Ipswich or is the Wherstead road over a railway bridge, certainly not suitable for 30 ton vehicles, or for any more traffic. I recently witness 2 container wagons try to get along the road, it was chaos. Vehicles had to reverse back in passing places on blind bends or go into peoples driveways, They brought down big dangerous branches. If another wagon came the other way it would be deadlock. Due to the danger created to other road users, the access to the road system needs to be severely restricted so no large vehicles can enter Church Lane from the Old A12, London road, from Ellenbrooke road along the Grove Hill Road and from the A137 along the ST, as all these roads are largely single carriageway with passing places, for large stretches it is impossible for a car to pass a lorry. If 2 large lorries meet the road is completely blocked.</td>
<td>The SCC Lorry Route Network Identifies the A12 as a Strategic lorry route, making it an appropriate route for lorries to use. Policy MS2 sets out the any planning permission must be accompanied by a traffic management plan, in order to reduce the impacts of increased traffic resulting from the quarry. In particular the traffic management plan is to prevent lorries from routing through nearby villages and up old London Road, unless in the case of local deliveries.</td>
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<tr>
<td>90890514</td>
<td>Mr Duncan Clarke</td>
<td>Yes</td>
<td>Insufficient attention has been paid to the effects of noise, dust and light pollution from the workings, and the extra heavy traffic generated.</td>
<td>The SCC Lorry Route Network Identifies the A12 as a Strategic lorry route, making it an appropriate route for lorries to use. Policy MS2 sets out the any planning permission must be accompanied by a traffic management plan, in order to reduce the impacts of increased traffic resulting from the quarry.</td>
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<td>(received via post)</td>
<td>An earth bund, with full trees and shrub cover along the south side of the A12, up to the Bucks Hook Cave Bridge and along Bucks Horn Cave. More trees and shrubs along the north side of the A12 to the Copdock roundabout. Daytime only working and no flood lights at night. 2nd access road to A137 as the St road is totally unsuitable and the bridge is too weak. Permission must be accompanied by a traffic management plan, in order to reduce the impacts of increased traffic resulting from the quarry. In particular the traffic management plan is to prevent lorries from routing through nearby villages and up old London Road, unless in the case of local deliveries.</td>
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| 89258921 Mr Stephen Edgell | Yes No Yes | I would consider that the number of vehicles needed will add pressure on the Old London Road indirectly (if the site lorries have to use the A12, then other drivers will seek to divert to avoid the extra traffic queues at copdock interchange). The proposed site is adjacent to the A12 slip road - junction 32B - therefore it is very close in distance from properties on the Old London Road. Finally, I had not appreciated that the site processes the sand and gravel - i had assumed it was merely extracted and then removed for processing elsewhere. So I am also concerned by the extent of the industrial noise and air quality. Policy MS3 requires that planning applications should include a traffic management plan. This is primarily to avoid quarry traffic diverting through nearby villages. The policy also required that a planning application is accompanied by an air quality assessment which considers the impacts from increased dust and include measures to minimise and mitigate these impacts. Assessment and mitigation of noise is also required by the policy. |

| 89396927 Mr Terry Corner, Chair, Copdock and Washbrook Parish Council | Yes Yes Yes | We are encouraged by the Local Plan Sustainable Appraisal to see some mitigation measures are being considered which will help reduce the concerns raised, viz.: -Woodlands and wooded tracks as historic landscape features should be retained and a suitable standoff distance maintained. Potential impacts upon nature conservation need to be adequately assessed and where necessary mitigation proposed. Highways have considered access and are happy whilst it is separated from the A12 using the existing roundabouts beneath the A12. It is suggested there is a precedent of agreements being reached with haulers to stop access to unsuitable roads such as Swan Hill and the Beagle Roundabout. Considered to be more effective than weight limits. There are a number of properties, the nearest 100 m of the site boundary. Mitigation and monitoring will be required to minimize the identified risk of impacts. The need to use standard mitigation measures such as earth screening bunds along with an additional standoff. Noted. |
buffer area. Looking at the proposed site, the Sustainable Development Group and Parish Councillors feel a number of extra, more detailed mitigation measures should help. The Ardleigh quarry site is considered best practice.

- An earth bund with tree and shrub planting alongside the south bound A12 carriageway. Haul road to be alongside the bund. Any lighting to be directed to the south east away from properties on the northern A12 carriageway. Light standards to be below the height of the bund.
- Access from the A12 / Copdock roundabout. Haul road alongside the wood to a wash and grading plant along with a weighbridge. All to be screened by a further earth bund and any lighting to be below bund height. Potential to move the wash and grading area into an adjacent field so Brockley Wood provides screening.
- Any overnight lorry parking to be screened.
- Overall, we favor setting the wash and grading and any subsequent cement mixing plant as far back on the site increasing the distance between the plant and houses.

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<tr>
<th>Reference</th>
<th>Name</th>
<th>Response 1</th>
<th>Response 2</th>
<th>Response 3</th>
<th>Response 4</th>
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<tbody>
<tr>
<td>88014215</td>
<td>Mr Stephen Clarke</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Noted</td>
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<td></td>
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<td>The correct response is “not known” as I am not aware of all the legal technicalities surrounding this matter but as this response is not available, I have had to respond “no.” I am not sufficiently qualified to respond to this question.</td>
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<tr>
<td>88003862</td>
<td>Mr Alan Davies</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>Noted</td>
</tr>
<tr>
<td>89987416</td>
<td>Mr James Potter</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>Policy MS3 identifies the potential impacts to groundwater and requires that any planning application addresses implications for water resources.</td>
</tr>
<tr>
<td>90549629</td>
<td>Ms Catherine Dell</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>The SCC Lorry Route Network Identifies the A12 as a Strategic Lorry Route, making it an appropriate route for lorries to use. Policy MS2 sets out the any planning permission must be accompanied by a traffic management plan, in order to reduce the impacts of increased traffic resulting from the quarry. The purpose of the Plan is to identify if sites are acceptable in</td>
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is operations, the A12 will have long ceased to be fit for purpose.

Development proposals in the Babergh and Mid Suffolk Joint Local Plan will also cause increased use of A12; this additional growth in traffic has not been taken into consideration. Details of facilities (e.g. screening of truck weighbridge) have not been published. It is therefore impossible to judge overall soundness of project.

To make the Local Plan Sound:

There must be a comprehensive re-evaluation of impact of quarry traffic on A12 and adjacent roads.

Full details of quarry design/facilities must be published.

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<tr>
<th>90820856</th>
<th>Mr Michael Watling (received via post)</th>
<th>Yes</th>
<th>No</th>
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</table>
| Considering the Site at Brockley Wood, i would object to the application as being unsuitable and inconsidered by the local authority (SCC). The location in relation to future traffic flows in the area do not appear to have been considered. It is known by the SCC highways dept that the A12 will be operating above capacity in 2021. To the locals in the area, we feel it is over capacity now especially at peak times. Whilst we are informed that lorries departing the site will be (subject to legislation being put into place in the application application) will not be permitted to use the existing dual carriageway through copdock & washbrook village, the effect of the lorries using the A12 will only drive more cars & vehicles through our village. The approval of this application is not just for the extraction of minerals, we do anticipate that this will lead to other activities also being carried out on the site i.e. ready mixed concrete plant & possible road making materials production. This will lead to even more traffic movements. Our village is also subject to pressure to provide more housing in which time will know doubt see more housing provision in the minerals extraction site. Existing residential properties in the near by location of the proposed principle, with detailed assessments and plans required at the planning application stage. Policy MS2 sets out criteria that any planning application must address in order to be granted planning permission. This include issues arising from the location of the site machinery and weighbridge and any screening necessary.

The SCC Lorry Route Network Identifies the A12 as a Strategic lorry route, making it an appropriate route for lorries to use. Policy MS2 sets out the any planning permission must be accompanied by a traffic management plan, in order to reduce the impacts of increased traffic resulting from the quarry.

While there is potential for future applications on this site to include other uses (such as concrete batching) these uses were not submitted in the call for sites which took place at the Issues and Options consultation. Planning applications for other uses of this sites will need to be considered on their own merits.

SCC and Babergh District Council have been in discussions regarding the Minerals Local Plan and the Babergh Mid Suffolk Joint Local Plan as they both develop, which includes impacts on the highways network.

The site policy also requires that a planning application is accompanied by an air quality assessment which considers the impacts from increased dust and include
extraction site will be severely disrupted and exposed to environmental issues even though some planning measures will be sought. Patching over these issues is not considered sufficient and will only endure the residents to a lower quality of life. There are more suitable locations available in the minerals extraction plan which are not near residential locations. It does not appear that Suffolk Highways have not considered the National Highways Agency 2013 report as it clearly identifies the forthcoming A12 capacity problem. No comments have been made about this. (see pages 3, 2nd paragraph) If the infrastructure of the area i.e. Copdock Mill Interchange, Ipswich Northern By Pass were implemented then consideration maybe more acceptable when traffic issues are addressed. Hopefully common sense will prevail!

Sort out the infrastructure in the area i.e. Copdock Mill Interchange & get working on the Ipswich Northern By-pass (long overdue)

measures to minimise and mitigate these impacts. Assessment and mitigation of noise is also required by the policy. This is with the aim of addressing potential amenity issues of nearby properties. The majority of the proposed sites do have some residential properties in the proximity of the site boundary, which is difficult to avoid, however assessment of environmental and amenity issues are required by policies in the plan to address these issues.

Both the A12, from Colchester to A12/14 roundabout at Tesco, are gridlocked on a twice daily basis. Traffic coming from Capel St Mary direction northwards will use the old A12 as a "rat run" to avoid stationary traffic backed up. The positioning of the entrance/exit is directly in to this constant problem. Either the lorries will choose the A12 and add even more problems, or they will choose the Old A12. This road is single carriageway from Swan Hill and is utterly unable to cope with large lorries. Also the double roundabout, which the lorries will have to negotiate on leaving/entering the site, is definitely NOT able to accommodate such vehicles. Until such time as SCC Highways deals effectively with the A12 this site should NOT BE CONSIDERED.

The purpose of the plan is to identify if sites are acceptable in principle, with detailed assessments and plans required at the planning application stage. Policy MS3 (which cross references Policy GP4) sets out

The SCC Lorry Route Network Identifies the A12 as a Strategic lorry route, making it an appropriate route for lorries to use. Policy MS2 sets out that any planning permission must be accompanied by a traffic management plan, in order to reduce the impacts of increased traffic resulting from the quarry.

In particular, the traffic management plan is to prevent lorries from routing through nearby villages and up old london road, unless in the case of local deliveries.

I consider the plan to be unsound as under:

1. There are no firm plans to ensure quarry tucks are prevented from using; Capel to Bentley link road. 32
Copdock & Washbrook Sustainable Development Group

Tonne quarry trucks cannot pass on this road yet has no weight limit proposed. Hall Lane Bentley Elm Lane Copdock and Church Lane Copdock. Swan Hill will be further congested

2. Quarry site needs to ensure washplant is hidden

I consider the current proposal as NOT SOUND based upon:
1. No proper consideration in ensuring that sufficient land has been acquired to shield the quarry from public view. It would be possible if the Wash Plant was screened behind Brackley Wood.

2. No specific area officially identified for offices, truck parking or weighbridge as required by law, sec have included this site in their Mineral Plan without detailed consideration - they are depending on Babergh to do this work but given the senior authority has included it in their Mineral Plan, it would be almost impossible for Babergh to refuse Planning Permission. Suffolk County Council relies very heavily on the site's immediate proximity to junction 32b stating that traffic can access the national highway system at that point. That is not in dispute but what they have ignored is what happens to the A12 when an extra daily 100 -120 32 tonne truck movements will join at that junction. SCC states that up to 90% of quarry deliveries will be made in Suffolk, the majority will use the Copdock Interchange; Brackley Wood being based in the south of the county adding to A12 congestion

Source: National Highways Agency A12/A120 route based strategy March 2013

3. The A12 will be functioning above capacity by 2021-(the anticipated opening of the Quarry)

4. Table 4 Copdock (Interchange): congestion now, so little scope for future growth

5. 2.6.5 ••• customers using the A12 have expressed concern about journey reliability, the lack of alternative routes when an issue arises and tie criteria that any planning application must address in order to be granted planning permission. This includes issues arising from the location of the site machinery and any buildings on site. It is expected that any planning application will show the screening required to shield the quarry from view. It should also be noted that the planning application on this site will not be handled by Babergh District Council, but by Suffolk County Council as the Minerals and Waste Planning Authority.

The SCC Lorry Route Network Identifies the A12 as a Strategic lorry route, making it an appropriate route for lorries to use. Policy MS3 sets out the any planning permission must be accompanied by a traffic management plan, in order to reduce the impacts of increased traffic resulting from the quarry. In particular the lorry management plan will be put in place to prevent lorries from routing through nearby villages, unless in the case of local deliveries.
safety of some junctions - in particular the heavily trafficked Copdock junction.....

6. Suffolk Highways did not present these facts for Suffolk Minerals & Waste to fully consider

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<thead>
<tr>
<th>90470935</th>
<th>Mr Paul Bastick</th>
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1. It does not state what steps are being taken to avoid adverse effects on our water supply, which is from a private borehole to 18 metres. 2. It does not exclude weekend working. 3. It mentions only some backfilling, whereas there should be backfill sufficient to allow successful return of the land to conservation at least.

Policy MS3 part "i" requires planning applications to assess for potential impacts on ground water sources. If any impacts are identified at the planning application stage, mitigation will be required to address these impacts.

Typical working hours for a quarry are 7am to 6pm during Monday to Friday and 7am to 1pm on Saturdays, being closed on Sundays and bank and public holidays. Working hours are set out in a planning condition. In some circumstances these can be different, however there has been no sufficient reason identified to have different working times for this quarry.

Backfill may be required as part of the quarry restoration. A restoration plan must be submitted as part of the planning application for the quarry. Policy MP6, which covers restoration of quarries, identifies that SCC has a preference for restoration that includes "net gains to biodiversity". I.e. that the restoration should improve conditions for wildlife.

### 12. CAVENHAM

*Policy MS4*
<table>
<thead>
<tr>
<th>Reference Number</th>
<th>Respondent</th>
<th>Legally compliant?</th>
<th>Sound?</th>
<th>Compliance with duty to co-operate?</th>
<th>SCC Response</th>
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</thead>
<tbody>
<tr>
<td>90013749</td>
<td>Mr Andrew Jarratt</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>The existing quarry generates high levels of HGV traffic with axle loadings completely unsuited to the C class roads used for access. These levels of traffic impact significantly on the villages of Cavenham and Tuddenham resulting in rapid rates and high levels of carriageway damage. The extensive carriageway damage creates significant noise pollution and vibration through the villages as traffic encounters the ruts and potholes created by the quarry traffic. The C class road between Cavenham and Tuddenham used by quarry traffic is too narrow to allow HGV traffic to pass oncoming road users safely or to overtake non motorised traffic safely. It poses significant danger to all road users. Pavements in Cavenham are in a very poor state of maintenance and this level of HGV traffic makes their use by pedestrians dangerous The proposed extension to the quarry will result in this level of HGV traffic with its associated carriageway damage and impact on residents' quality of life continuing for many years to come. The proposed inert waste recycling plant will add an estimated 40 lorry movements per day, potentially a 50% increase in current traffic levels. This is unsustainable and unacceptable. There is a simple solution to reduce quarry traffic through the villages of Cavenham and Tuddenham. As a condition of planning being granted, the council should require Allen Newport Ltd to build an access route connecting the Cavenham road to the Higham road. via the existing track via the sewage works (see map MS4 Cavenham) this would obviate the need for quarry traffic heading south to the the A14 and beyond passing through either village. The higham road is of adequate width with little to no housing and provides direct access to the A14 junction at Higham. The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.</td>
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<tr>
<td>Reference</td>
<td>Name and Contact</td>
<td>Comments</td>
<td>Notes</td>
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<tr>
<td>90458771</td>
<td>Mr James Meyer, Suffolk Wildlife Trust</td>
<td>No No No</td>
<td>This site is within the Breckland Special Protection Area (SPA) and the Breckland Farmland Site of Special Scientific Interest (SSSI), these sites are designated for internationally important numbers of breeding stone curlew. The site is adjacent to Cavenham-Icklingham Heaths SSSI and Cavenham Heath National Nature Reserve (NNR), Cavenham Heath is also a component of the Breckland Special Area of Conservation (SAC). Whilst the ecology section (11.17) identifies that there is the potential for adverse impacts on stone curlew, no avoidance, mitigation or compensation measures are suggested. Potential impacts on the SPA and SAC must be assessed as part of the Habitats Regulations Assessment (HRA) for the Local Plan and sites should not be allocated which would result in an adverse impact on the designated sites. It must also be ensured that should any extraction be allocated in this location, that the site restoration plan maximises the area’s value for the species for which the SPA and SSSI are designated. It must be ensured that the site is suitable for extraction through the HRA process and that the Local Plan Policy secures any necessary strategic mitigation measures identified as part of this. This is in addition to the requirement for a project level HRA to be undertaken at the planning application stage, should the site be allocated.</td>
<td>SCC has revised the HRA, due to the European Court of Justice People Over Wind decision and has carried out a focussed consultation on this.</td>
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<tr>
<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td>- - -</td>
<td>We welcome the policy wording to safeguard and preserve and enhance the setting of the scheduled monument</td>
<td>Noted.</td>
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</tr>
<tr>
<td>90818618</td>
<td>Farah Chaudry (received via email), Team Leader, Norfolk &amp; Suffolk</td>
<td>- - -</td>
<td>Policy MS4: Cavenham We advise amending the wording in relation to nature conservation to include the following: e) likely adverse effects (either individually or in combination with other developments) on the notified</td>
<td>Cumulative effects of minerals sites with other development is covered in policy MP5 and it would be considered unnecessary duplication of policy to include this in each site.</td>
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<td>Reference</td>
<td>Name and Title</td>
<td>Response</td>
<td>Note</td>
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<td>Natural England</td>
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<td>special interest features of Breckland SPA, Breckland SAC, Breckland Farmland/Cavenham-Icklingham Heaths SSSIs and Cavenham Heath NNR…. etc. Further information on any required avoidance/mitigation measures at this site should be provided within the Plan (cross-referencing to the HRA) as well as indicating the need for detailed project level HRA.</td>
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<tr>
<td>90644708</td>
<td>Miss Caroline Jeffery, Principle Planner (Minerals and Waste Policy), Norfolk County Council</td>
<td>Yes</td>
<td>SCC has revised the HRA, due to the European Court of Justice People Over Wind decision and has carried out a focussed consultation on this.</td>
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<td>Norfolk County Council has the following comment to make: The site allocated at Cavenham for mineral extraction is located within the Breckland SPA. The Task 1 Screening Habitats Regulations Assessment, which has been carried out on the policies and specific site allocations of the Suffolk Minerals and Waste Local Plan, concludes that the allocation of this site “will have a neutral effect upon the designated sites until such time as a project-specific HRA screening process and Appropriate Assessment has been undertaken”. If sites were proposed for mineral extraction within the Breckland SPA in Norfolk, we would only consider making such allocations if a Task 2 Appropriate Assessment of the relevant Local Plan policies concluded that ‘no adverse effects are expected on the integrity of the SPA’ in order to have confidence that the sites would be deliverable. We consider this approach would be in accordance with the Conservation of Habitats and Species Regulations 2010, unless Natural England advise otherwise.</td>
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<tr>
<td>90698935</td>
<td>Mr &amp; Mrs Terence &amp; Josephine Nicholls</td>
<td>Yes, No, No</td>
<td>Noted.</td>
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<td>The proposal does not give due consideration to the size, construction or condition of the existing road infrastructure. The road leading to and from the existing and proposed quarry is a “C” class road, never constructed to carry loaded wagons (or the numbers) of the size and weight being used. The drainage system through Cavenham is damaged and</td>
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<tr>
<td>90699157</td>
<td>Mr &amp; Mrs Terence &amp; Josephine Nicholls</td>
<td>Yes, No, No</td>
<td>The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.</td>
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inoperative due to this overuse and the failure of Suffolk County Council to maintain and make good. The footpaths in Cavenham are in an abysmal state of repair, any one using them when heavy vehicles pass is in danger of injury. The damaged road surface and dropped drains cause potential damage to old houses which were not built with adequate foundations to withstand the vibrations from such heavy trucks. They were built when transport was horse and cart or small wagon /tractor designed to carry approx 10 tons max. My own home has a "dropped" drain outside which Suffolk Highways will not repair, any heavy vehicle pasing over this creates a load bang and vibration. When it rains and the inoperative drain does not take away the water any passing vehicle sends a huge flume of water over my wall. This damages the flint wall and my garden. There is a potential to create an access to the quarry from a point Map Ref TL745711 on Cavenham road to Map Ref TL701705 on the Higham road. This would create access to the A14 without the need for vehicles to pass through Cavenham or Tuddenham, greatly reducing the traffic effects on either village. This road would be at little cost to the potential calming effects of it's construction. Suffolk Council and the quarry owners need to seriously address this option. Speding heavy vehicles are also a major cause for concern, particularly in Cavenham. Suffolk Police do not seem interested until there is a major accident.

The construction of the link road would significantly reduce the number of vehicles passing through Tuddenham and Cavenham. Major repairs to the existing infrastructure would make significant improvements to traffic effect in the two villages but would not improve safety and prevention of ongoing damage as much as a link road.

90700286  Mr & Mrs Terence &  Yes  No  No  There is a proposal to add a Recycling facility to the proposed quarry extension at Cavenham to handle  The existing access arrangements are considered acceptable based on existing flows. Further
Josephine Nicholls

inert waste. This will merely create more traffic over currently overloaded, poor standard and badly maintained infrastructure. This proposal will merely help the quarry owner to backfill his pit with waste material. The original quarry licence required that the land was reinstated and returned to amenity land with lakes and a visitor centre. Suitable for wildlife etc. This should be a consideration that these works are done prior to grant of licence for any new development.

Refuse the application for a waste recycling facility and ensure that remedial works are completed to the existing pit as previously agreed. Any inert material created elsewhere should be dealt with at it’s point of creation and marketed/used from there. There is no need to haul it to and from or handle it at Cavenham Pit.

| 90737193 | Mr Jonathan Worsley (received via email), Consultant, PDE Consulting | Yes | Yes | Yes | With reference to the above, we are writing in support of the site at Cavenham being included within the pre-submission draft documents. | Noted. |
| 90740351 | Mr Steve Merry (received via email), Transport Policy and Development Manager, Suffolk County Council | - | - | - | In the LHA response (Paragraph 11.10) it was presumed that that mineral extraction and landfill will not be concurrent and therefore there is no intensification of use. | This assumption is incorrect. However it is understood that the LHA are not ruling out the possibility that evidence accompanying a planning application that includes landfilling may be able to demonstrate that an increase in HGVs would be technically acceptable. |
| 90766342 | Miss Charlie Christensen, Planning Advisor, Environment Agency | Yes | Yes | Yes | The floods section in Policy MS4 does not address flood risk from all sources, in particular fluvial and surface water. A section in the North-East of the sand and gravel extraction area is situated in Flood Zone 2, and half the inert waste tipping area is also in Flood Zone 2. There are also some areas at risk of These aspects are adequately covered by the existing policy wording and the precise details would be covered at the planning application stage. It is also worth noting that there existing mineral extraction operations. |
surface water flooding. Although the Policy states that development will only be acceptable as long as the proposals address the implications for those parts of the site within Flood Zone 2, we would like to see included that a Flood Risk Assessment (FRA) would be needed to demonstrate the risk of flooding to those working onsite and to ensure that flood risk is not increased. We would recommend that a flood plan is prepared for the development, which should include an appropriate method of flood warning and evacuation, to ensure the safe use of the development in extreme circumstances. Climate change should also be assessed to determine the risk to the site in the future. We would also expect bunds and materials to be stored outside of the floodplain, however if there are, we would expected flow paths to be considered to ensure there is no increase in flood risk and bunds have gaps in for flood water. The site is also adjacent to Cavenham and Icklingham heath SSSI’s which are wetland sites and therefore rely on groundwater levels in the chalk and overlying sands and gravels. The Groundwater Terrestrial Ecosystem (GWTE)/wetland of Cavenham and Icklingham heaths are currently failing in Water Framework Directive (WFD) and is a reason that the WFD groundwater body (Cam and Ely Ouse chalk) is given poor status. The section of the SSSI that is currently failing is to the north-east of the existing quarry, however if sand and gravel extraction is allowed to the west of the current quarry there is a big risk that it will impact on another part of the SSSI (between the proposed extension and the River Lark). We would object to this site for sand and gravel extraction unless the mineral is worked wet, with no de-watering taking place, and a significant buffer zone is left between the sand and gravel extraction site and the wetland SSSI to the north. We would like to see this included in the Policy. Paragraph 11.27 also states that Cavenham is in a Groundwater SPZ. However, this is under the ‘Floods’ heading. We are supportive of the reference to these constraints, however the issues of flooding and the location within a SPZ should be separated.
out. We would like to see either two separate headings, or a single heading named ‘Flooding and Groundwater’. Although we note that restoration is not proposed, some restoration of the existing site is currently utilising inert material, and we would consider this appropriate for this potential extension. The site is very sensitive regarding groundwater quality as well, and we would not consider hazardous or non-hazardous restoration appropriate.

The strategic planning requirements set out in NPPF paragraphs 109, 114 and 117 (see our comments on the Vision, Aims and Objectives) and the requirement of policy MP6, which states that ‘preference will be given to restoration proposals that incorporate a net gain for biodiversity’ and ‘providing links to surrounding habitats is also encouraged’, indicate that it is appropriate for the plan to include strategic guidance on the most appropriate restoration proposals. We would also recommend that in the course of revising the HRA for this plan, that revisions to site policies giving guidance to the most suitable forms of biodiversity restoration are an acceptable means of ensuring that the plan is effective and that sites can deliver any restoration proposals required under HRA.

In addition, minerals extraction on this site, within the Breckland SPA, will result in an adverse effect on the integrity of the SPA through displacement of nesting birds, and without mitigation would not be permissible at the development control level, leaving the plan undeliverable.

For this site, we recommend that as an absolute minimum the following are incorporated into the site policy and/or supporting text where appropriate.

• Provision of alternative habitat for displaced SPA features for the period of the extraction. Whilst the proposed allocation is temporary, it will result in a loss of SPA habitat for a significant period, and this
should be mitigated for by provision of suitable nesting habitat elsewhere for the period of the works.

- Restoration to wildlife-rich habitats. In line with existing minerals consents in the SPA, restoration of mineral sites within the stone-curlew habitat of the SPA should be to Brecks grass-heath, the preferred habitat of stone-curlew, in order to maximise the likelihood of the SPA species returning to use the site after the minerals working.

- Given the proposed allocation’s location within the SPA, any allocation must be able to demonstrate that it will be able to avoid any significant increases in pollution to the surrounding site, from sources including (but not necessarily limited to) dust, noise, lighting, human and vehicle disturbance on site and on access routes and changes to the surrounding hydrology.

- We expect that such measures would also apply to any similar international designations (such as Ramsar sites and SACs) and also include similar measures to avoid adverse effects on Sites of Special Scientific Interest.

- If the above is possible and the sites are taken forwards in the plan, then they should be included as site specific policies in the submission stage of the plan, and accompanied by the appropriate level of detailed assessment in a revised HRA.

Following the submission draft consultation, the Plan HRA has been revised in relation to the recent European Court of Justice ruling "People Over Wind" and consultation has been undertaken. Cumulative effects of minerals sites with other development is covered in policy MP5.
<table>
<thead>
<tr>
<th><strong>West Suffolk District Councils</strong></th>
<th><strong>SMWLP Responses to Submission Draft Consultation March 2019</strong></th>
</tr>
</thead>
</table>

This is also a sensitive site in the Brecks. The site is adjacent to Cavenham Heath NNR, Cavenham-Icklingham Heath SSSI, Cavenham Heath RIGS. This site is located within Breckland SPA and adjacent to Breckland SAC. It is noted that a Habitats Regulations Assessment has been undertaken. FHDC is concerned the likely significant effects appear to have been screened out for this site without justification and reliance has been placed entirely on a project specific HRA. The potential for in-combination effects should also be considered and you may wish to consider proposed development at RAF Lakenheath DC/18/0456/EIASCR, development allocated in the adopted SEBC Vision 2031 documents and in the FHDC Proposed submission SALP (as modified). The potential for other ecological and landscape effects does not appear to have been considered in any detail at this stage. Paras 11.21-11.24 detail that the traffic associated with the proposed extension is not yet known, (without further geological investigations on site). An air quality assessment, (which the supporting text states will be submitted with a future planning application should over 100 HGVs be generated each day from the site), should consider cumulative impacts. Noise measures are considered in para 11.25. This is reinforced in Policy MS4 requirements (f) and (g).

<table>
<thead>
<tr>
<th>Mrs Esme Murfitt (Received via post)</th>
<th>- No -</th>
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</table>
| Because it does not take into consideration the impact the expansion will have on residents in regard to increased traffic, noise & environmental damage. Already Tuddenham is overwhelmed by heavy traffic using the High Street as a cut - through from the A11 - A14 & in reverse A link road created between the trunk roads (i.e. A11 & A14) avoiding residential areas would relieve pollution & gives access to major roads for heavy traffic without affecting the quality of life for villagers. The speed, size & volume of traffic has long been an

<p>| The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes. |</p>
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<tr>
<th>ID</th>
<th>Name</th>
<th>Response</th>
<th>Response</th>
<th>Response</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>89848142</td>
<td>Mr Kevin Hamilton</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Issue in Tuddenham. Properties on the main street and being damaged by vibration. The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.</td>
</tr>
<tr>
<td>89940046</td>
<td>Mr Ralph Brownie</td>
<td>No</td>
<td>-</td>
<td>-</td>
<td>The Local Plan, MS4 for Cavenham, is not sound as it shows a positive impact on traffic. In reality the roads leading to and from the Marston pit are already inadequate for current levels of traffic; leading to increasing friction with the highways department. This proposal to increase tonnage over these roads by 80% simply cannot be sustained with existing infrastructure. The definition of a positive impact on traffic in the Sustainability appraisal (objective 24: to promote efficient movement patterns in the County) is that the proposal has no objection from County Highways Authority and access is directly onto the Suffolk Lorry Route Network. The site meets both of these criteria. Policy MS4 part “a” requires any planning application to address the safety and amenity issues presented by increased HGVs. The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.</td>
</tr>
<tr>
<td>89996357</td>
<td>Mr Andrew Long</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>All of the above. It fails to take into account the quite dreadful impact that an expansion of this magnitude will have on local villages. At the very least the expansion needs to be scaled back to something less dramatic and a relief road needs to be constructing directing traffic away from the villages. It should be mandatory for all vehicles using the quarry to use this road. Whether they are part of the extraction process or delivering the so called inert waste. The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.</td>
</tr>
<tr>
<td>90104187</td>
<td>Mrs H Long</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>You are destroying two small villages, with no thoughts of their futures, but only that of the quarry and the money it will make. The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application.</td>
</tr>
</tbody>
</table>
This whole form is bias to the quarry side. Be interesting to what your kick back is. Points of worry for myself are, too many more lorries through the village, water table probably becoming non existent, it’s already disappearing, noise, dust, and a huge drop in house prices. I’m guessing you won’t be covering that, while you are making the money 😂

application that included for example the backfilling of the quarry with inert wastes.

Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites. A detailed noise assessment is required as part of any planning application for this site, which should identify the appropriate mitigation to make noise acceptable for public amenity.

Potential air pollution receptors have been identified near to the site. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust management.

House prices are not a planning consideration.

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<tr>
<th>Reference</th>
<th>Name</th>
<th>Yes/No</th>
<th>Yes/No</th>
<th>Yes/No</th>
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<tbody>
<tr>
<td>90239217</td>
<td>Dr Kurt von Bussmann</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>90259090</td>
<td>Mr Peter Vinyard</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>90260562</td>
<td>Mrs Jennifer Baker</td>
<td>No</td>
<td>No</td>
<td>No</td>
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</table>

The increase in the size in the quarry will lead to a significant and unacceptable degree of noisy, heavy lorry traffic through Cavenham.

The construction of a relief road from the Quarry to Higham Road would obviate this problem.

The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.

The road is not capable of more larger traffic.

The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.

has not taken into consideration the significant increased in HGV traffic through a small residential village.

The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application.
<table>
<thead>
<tr>
<th>Reference</th>
<th>Name</th>
<th>1st response</th>
<th>2nd response</th>
<th>3rd response</th>
<th>Comment</th>
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<tbody>
<tr>
<td>90240574</td>
<td>Mrs Elizabeth Goodman</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>- Noted. The application that included for example the backfilling of the quarry with inert wastes.</td>
</tr>
<tr>
<td>90306619</td>
<td>Mr F Cox</td>
<td>-</td>
<td>No</td>
<td>-</td>
<td>Unsound in that there has been no consideration given to the infrastructure impact of increased traffic with additional heavy vehicles travelling on inadequate road surfaces, and in consequence damage to roads, other vehicles and therefore an impact on safety. Divert quarry traffic across from the site on Cavenham Road to Higham Road. This access track could easily be formed using materials from the quarry.</td>
</tr>
<tr>
<td>90333597</td>
<td>Mr Robert Gray</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>The inclusion of the inert waste will increase the HGV traffic to an unacceptable level. Resulting in an increase in pollution, damage to the already unsuitable roads, nearby properties and general health and safety of the residents. A relief road, taking bypassing both Cavenham &amp; Tuddenham would alleviate most of the problems. Or rejecting the need of inert waste disposal also reducing the size of planned extension.</td>
</tr>
<tr>
<td>90384150</td>
<td>Mr Richard Stevens</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>I write to support the inclusion of the Cavenham site in the Suffolk Minerals &amp; Waste Local Plan, as set out in the Pre-Submission Consultation documents. Please accept this email as a representation to the consultation running from 11th June – 23rd July.</td>
</tr>
<tr>
<td>90395768</td>
<td>Dr Catherine Dunnett</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No idea! Noted. The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.</td>
</tr>
<tr>
<td>90400601</td>
<td>Mr Daniel Gower</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>As a local resident and lay-man I feel that local issues have not been taken into consideration. As a local resident and lay-man I feel apart from the increase in pollution and noise from extra extraction and lorries the Villagers haven't been given due consideration regarding the impact of vehicle movements on THEIR lives. This includes extra...</td>
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Suffolk County Council

Page 134
diesel pollution damage to the already under-funded roads, noise, and possible speeding through the village and especially Cavenham Road that could put children and our pets in danger.

90412722  Mr John Hellard  -  -  -  -  Noted.

90516042  Mr Graham Dudley (received via post)  Yes  Yes  No  Firstly this form is a nightmare it is not designed for everyday people if it was intended to put them off its don a good job, the plain English brigade would have a field day.

Sand and gravel has to be extracted to meet the dictate from government this I have no problem with even on my own doorstep however SCC are having little regard for the Infrastructure to support their operation, our rural "C" class roads are struggling enough without adding another 40% in volume.

I strongly recommend relief roads south to the Higham road and/ or north to the A 1101 this would ease traffic going through Tuddenham and Cavenham.

A lot of the cost can be offset by using materials from the quarry.

90523059  Mrs Vickie Lack (received via email)  -  -  -  Dear Sir, I live in Tuddenham. I would like to register my objections to the proposed expansion of the quarry in Cavenham. One of my main concerns is the increase in traffic along a narrow High Street. The cars on the High Street are already forced to park illegally on the pavements on either side of the road. There are often near misses as the road is narrow and it is necessary to give way if someone does park on the road. The High Street is already a 'rat run' for traffic between the A11 and A14. Emergency vehicles travel at speed along the High Street. I would like to know how you will mitigate against the extra traffic and how it will be managed? An additional concern is the increase in noise, vibration and pollution that will accompany the additional traffic. Tuddenham is a very small, unsustainable

The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.
For the attention of Graham Gunby
Dear Graham,

My name is Shaun Fox and I live at 4 Chapel Lane, Tuddenham St Mary Suffolk IP286SP
I am writing to complain passionately about the proposed expansion of this site and the subsequent increase in HGV traffic. I see in the report that it is assumed that there will be 70-80 HGV movements proposed.

HGV traffic from the current site (lorries carrying aggregate) is already creating traffic and noise problems in the High Street and I believe that it is only a matter time before there is a major accident resulting in injuries or fatalities as a result of these vehicles in the High Street. For the record, it has become increasingly difficult and dangerous to leave Chapel Lane.

Chapel Lane connects to the High Street and exiting it is treacherous as cars swerve to avoid HGVs. Tuddenham High Street is a narrow village high street already blighted by speeding HGVs. Increasing the burden and blight on local people with increasing numbers of HGVs coming in and out of the quarry many of which will pass along the High Street could result in catastrophic consequences.

The noise, air quality and danger to local residents of increasing numbers of HGVs thundering along the High Street must be considered.

The dangerous bend in the road close to the White Hart pub also poses a serious threat as the lorries straddle the entire road as they go around the bend. I would urge assessors to spend some time actually in situ on the High Street to evaluate the current situation.

I have deliberately not used overly dramatic language in this email, and what I have stated above I believe to be accurate and I am filled with a sense of foreboding if this proposal goes ahead.

The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.

The Volume of heavy goods traffic is already far too much for the roads around and through Cavenham.
<table>
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<tr>
<th>(received via email)</th>
<th></th>
<th>and Tuddenham St Mary. To add another forty (plus??) movements of lorries will only increase the danger, noise and despair in the villages affected. I fear only a fatality will concentrate minds as to the folly of this expanded operation. assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.</th>
</tr>
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<tbody>
<tr>
<td><strong>90531756</strong> Mrs Anne Ball (received via post)</td>
<td>-</td>
<td>No As stated the further increase in lorries going through the village, causing disruption, congestion and danger. Lorries already speed through the village, creating a dangerous situation. The vibration &amp; weight caused cracks to appear in our front faced cottage. Please pursue alternative route and enforce highways regulations for villages - upkeep the condition of the road to good, to prevent accidents &amp; damage to property &amp; vehicles. It is obvious that the stone curlew, has more rights and considerations, than humans. I fully understand that Stone Curlews have to be protected, but surely this should include the residents and Tuddenham &amp; Cavenham. The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.</td>
</tr>
</tbody>
</table>
| **90637782** Mrs Patricia Gray (received via post) | No | No 1. The planned extension is too large and it encroaches on most of the village of Tuddenham, the nature reserve & the organic farm.  
2. The increase (80%-100%) of HGV’s through the village on inadequate roads is totally unacceptable on every count of health & safety regulations.  
3. Once extraction has been completed the land supposedly is being returned to heathland which will never happen as vast quantities of inert waste is buried there. The ecology of the entire area will be changed totally & not for the better  
4. The site of the planned extension should be reduced to allow a large buffer zone between the quarry works and the village/nature reserve & organic farm with trees + hedging provided to act as a noise+dust screen.  
5. The inert waste should not be included in the planned extension . Full stop. Thereby no drastic & damaging huge increase in HGV's through the villages. 1. The planned extension is large but would be worked and restored on a phased basis.  
2. The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.  
3. The proposed restoration would be likely to be a mixture of agriculture and heathland. Careful management of solid means that both agricultural improvement and heathland could be created.  
4. The mitigation of noise, dust and visual impacts is part and parcel of a minerals planning application.  
5. See response to 2 above.  
6. See response to 3 above. |
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<th>ID</th>
<th>Name</th>
<th>Response</th>
<th>Comment</th>
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<tbody>
<tr>
<td>9064390</td>
<td>Mrs Gilliah Peters</td>
<td>No</td>
<td>There are already 50 lorry movements daily in and out of the quarry using narrow ‘c’ roads never intended for the weight or size of the lorries. Proposals to include recycling of inert waste would add a further 40 in and out journeys daily. Damage is already being done to the old properties fronts on to the street &amp; will only increase. Also likely to be health problems from inert waste passing so close to the houses. There is a dangerous blind bend by the pub &amp; lorries have to cross the central line to negotiate it. Enlarged site is too close to Longwood organic farm &amp; adjacent properties. All this heavy traffic on narrow ‘C’ roads is dangerous. Consideration should be given to strengthening the track lead up off the Cavenham road (very close to the quarry exit) which would skip the sewage works and join the Higham Road. Turning left there the lorries would reach the A14 approx 2 miles ahead. Higham &amp; Cavenham roads are classified ‘c’ but traffic would not longer be going through Tuddenham &amp; Cavenham villages. The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.</td>
</tr>
<tr>
<td>90707328</td>
<td>Mr Richard Cruse</td>
<td>No</td>
<td>At table 54, objective 24, page 207 the report states there will be a positive impact from the Cavenham Quarry extension, however it is accepted by the current quarry operator that their operation/vehicle movements already have an impact on the village of Tuddenham, the report gives no justifiable explanation as to how it thinks that there is a positive impact on transport through these proposals. The commentary states “The established road access to the existing quarry utilises the C class roads to access the wider road network via the villages of Cavenham and Tuddenham St Mary. The roads are however part of Suffolk Lorry Route Network and are designated as Local Access Lorry Routes. The existing access arrangements are acceptable based on the existing flows.” This commentary makes the</td>
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assumption that the existing HGV movements will not increase and does not take into consideration the reports contradictory tone on page 281 which states, “there may be cumulative impacts associated with those proposals at Cavenham (CA1, CA2 and CA3 unison) should this combination of sites exceed 100 movements a day. For this reason, uncertain impacts are associated with the Cavenham sites and highlighted within this cumulative impact assessment”. The council’s site selection report states “The number of Heavy Goods Vehicles (HGVs) generated by the proposals is not currently known, as the full results of the geological investigations are not yet available from which this can be determined.” Therefore I propose that this report is not sound as it contains incomplete information, contradictory statements and is not based on sound proportionate evidence.

The commentary attached to objective 24, page 207 should be amended to read “The established road access to the existing quarry utilises C class roads to access the wider road network via the villages of Cavenham and Tuddenham St Mary. The roads are part of the Suffolk Lorry Route Network and are designated as Local Access Lorry Routes. Continued use of these roads by HGV’s will have a detrimental effect on the villages of Cavenham and Tuddenham St Mary”, the sustainability impacts should also be amended to show negative.

<table>
<thead>
<tr>
<th>90715841</th>
<th>Mrs Tamsin Farrant</th>
<th>No</th>
<th>No</th>
<th>No</th>
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</table>

- The planned extension is too large and encroaches right up to the boundary of Cavenham Heath nature reserve and Longwood Organic farm and goes too close to the village of Tuddenham.

- No provision has been made as to how the aforementioned will be shielded from the planned extension.

- No provision has been made as to how the planned extension will be left, post extraction. It is unclear as to whether it will be in-filled to original level, and with

The planned extension is large but would be worked and restored on a phased basis.

- The mitigation of noise, dust and visual impacts is part and parcel of a minerals planning application. An in-principle assessment of these aspects has been carried out within the site selection report.

- The proposed restoration would be likely to be a mixture of agriculture and heathland. Careful management of soil means that both agricultural
what material, and whether or not it will return to agricultural use.

No investigations have been made into what effects the planned extension will have on the surrounding area, mainly water levels, air pollution, noise pollution and possible subsidence.

No definitive description has been supplied for the “inert” waste which is planned to infill the quarry. Who will be policing this waste to make sure that it doesn’t contain anything which maybe detrimental to the surrounding environment? No provision has been made to improve the surrounding roads to cope with the many lorries that will be using it.

No investigations have been made following suggestions of a relief road, despite promises to do so.

No definitive numbers have been placed on the increase in HGV traffic, but it is suggested that it will be an 80-100% increase due to the recycling of “inert” waste, and this is unacceptable.

The size of the planned extension should be reduced, allowing for a large buffer zone between Tuddenham Village, Cavenham Heath nature reserve and Longwood Organic farm. Banks and hedges should be used as screening to reduce noise and dust pollution. Statements need to be made as to how the planned extension will be left, such as proposed use and final ground level. Investigations need to be made to ensure that the extension will have no detrimental effects on the surrounding environment. If the planned extension is reduced in size, the likelihood is that any detrimental effects will be minimised. The planned recycling and dumping of “inert” waste should not be allowed at Cavenham Quarry. This will drastically reduce the amount of HGVs and remove the possibility of environmental pollution from unsuitable materials. Serious investigations need to be made as to the possibility of improvement and heathland could be created. Infilling has not been proposed in the Plan.

Information regarding into what effects the planned extension will have on the surrounding area, mainly water levels, air pollution and noise pollution are included in the site selecton report.

Inert waste is defined within the glossary as mainly surplus uncontaminated soils and clays. Sampling of loads is undertaken as a condition of the permit in order to ascertain the contents and loads are rejected if they are unsatisfactory.

The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a signicant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.

Allen Newport have investigated the relief road and have concluded that it is not something that they wish to pursue.

Much more detail would be provided at the planning application stage such as details of screening, noise and dust mitigation and restoration.
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<th>Reference</th>
<th>Name</th>
<th>Action 1</th>
<th>Action 2</th>
<th>Action 3</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>90717201</td>
<td>Mr Christopher Farrant</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>a relief road, solely for quarry HGVs bypassing both Tuddenham and Cavenham and thus drastically reducing the amount of HGVs passing through both villages. If a relief road is not viable, then provisions need to be made to maintain the existing roads, which are not designed for constant HGV use.</td>
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<td>The planned extension is too large and encroaches right up to the boundary of Cavenham Heath nature reserve and Longwood Organic farm and goes too close to the village of Tuddenham. No provision has been made as to how the the afore mentioned will be shielded from the planned extension.</td>
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<td>No provision has been made as to how the planned extension will be left, post extraction. It is unclear as to whether it will be in-filled to original level, and with what material, and whether or not it will return to agricultural use.</td>
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<td>No investigations have been made into what effects the planned extension will have on the surrounding area, mainly water levels, air pollution, noise pollution and possible subsidence.</td>
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<td>No definitive description has been supplied for the &quot;inert&quot; waste which is planned to infill the quarry. Who will be policing this waste to make sure that it doesn't contain anything which maybe detrimental to the surrounding environment?</td>
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<td>No provision has been made to improve the surrounding roads to cope with the many lorries that will be using it. No investigations have been made following suggestions of a relief road, despite promises to do so.</td>
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<td>No definitive numbers have been placed on the increase in HGV traffic, but it is suggested that it will be an 80-100% increase due to the recycling of &quot;inert&quot; waste, and this is unacceptable.</td>
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<td>The planned extension is large but would be worked and restored on a phased basis. The mitigaton of noise, dust and visal impacts is part and parcel of a minerals planning application. An in-principle assessment of these aspects has been carried out within the isle seletion report.</td>
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<td>The proposed restoration would be likely to be a mixture of agriculture and heathland. Careful management of solid means that both agricultural improvement and heathland could be created. Infilling has not been proposed in the Plan.</td>
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<td>Information regarding into what effects the planned extension will have on the surrounding area, mainly water levels, air pollution and noise pollution are included in the site selecton report.</td>
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<td>Inert waste is defined within the glossary as mainly surplus uncontaminated soils and clays. Sampling of loads is undertaken as a condition of the permit in order to ascertain the contents and loads are rejected if they are unsatisfactory.</td>
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<td>The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.</td>
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<td></td>
<td>Allen Newport have investigated the relief road and have concluded that it is not something that they wish to pursue.</td>
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</table>
The size of the planned extension should be reduced, allowing for a large buffer zone between Tuddenham Village, Cavenham Heath nature reserve and Longwood Organic farm. Banks and hedges should be used as screening to reduce noise and dust pollution. Statements need to be made as to how the planned extension will be left, such as proposed use and final ground level. Investigations need to be made to ensure that the extension will have no detrimental effects on the surrounding environment. If the planned extension is reduced in size, the likelihood is that any detrimental effects will be minimised. The planned recycling and dumping of “inert” waste should not be allowed at Cavenham Quarry. This will drastically reduce the amount of HGVs and remove the possibility of environmental pollution from unsuitable materials. Serious investigations need to be made as to the possibility of a relief road, solely for quarry HGVs bypassing both Tuddenham and Cavenham and thus drastically reducing the amount of HGVs passing through both villages. If a relief road is not viable, then provisions need to be made to maintain the existing roads, which are not designed for constant HGV use.

The impact of the extra traffic that will be created by the expansion of the gravelworks and the new recycling plant has not been taken into account anywhere in this document. Table 54 even points to a positive effect on traffic. This is not the case, and as this planning document has failed to recognise such an obvious and harmful effect on the health, wellbeing and safety of the residents of Tuddenham St Mary and Cavenham, it can't possibly have been researched thoroughly and is unsound.

To avoid the HGV vehicles coming from the gravelworks through the village, a private road should be put in for the duration the site is in operation. This road would bypass the village, running from the Cavenham Road before you enter Tuddenham (outside the 30 zone), to the Higham Road (outside the 30 zone) with the road passing in the vicinity of

The definition of a positive impact on traffic in the Sustainability appraisal (objective 24: to promote efficient movement patterns in the County) is that the proposal has no objection from County Highways Authority and access is directly onto the Suffolk Lorry Route Network. The site meets both of these criteria. Policy MS4 part “a” requires any planning application to address the safety and amenity issues presented by increased HGVs.

The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.
the waterworks. Proper entrances would need to be constructed at the road junctions but the majority of the road can be a gravel track comparable to the track that currently leads to the quarry. A good portion of this land already belongs to Hiams so it is only a small section that would need to be rented/purchased. It would also increase efficiency of travelling time for the vehicles by bypassing the slow village roads and so would be commercially sound.

Allen Newport have investigated the relief road and have concluded that it is not something that they wish to pursue.

<table>
<thead>
<tr>
<th>90729772</th>
<th>Mr James Unwin</th>
<th>-</th>
<th>No</th>
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<td></td>
<td>The impact of the extra traffic that will be created by the expansion of the gravelworks and the new recycling plant has not been taken into account anywhere in this document. Table 54 even points to a positive effect on traffic. This is not the case, and as this planning document has failed to recognise such an obvious and harmful effect on the health, wellbeing and safety of the residents of Tuddenham st Mary and Cavenham, it can't possibly have been researched thoroughly and is unsound.</td>
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<tr>
<th>90097499</th>
<th>Mrs Nichola Hamilton</th>
<th>No</th>
<th>No</th>
<th>Yes</th>
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<tr>
<td></td>
<td>In the &quot;Suffolk Minerals &amp; Waste Local Plan, Preferred Options Draft October 2018&quot; it is quite clearly stated that there are no shortfalls in current waste management Facilities, so Cavenham does not need to host a complete new business of waste processing.</td>
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Void space is constantly being used up and so replacement sites need to be identified for future use.

An Appropriate Assessment carried out under the Habitat Regulations concludes that an extension to the
The excavation expansion will impact the wildlife in a dedicated SSI. The air quality will be affected by an increase of HGV movement by >100%. The proposal to increase excavation will impact a clearly significant archeological area.

The excavation area should be reduced to the extent that there is no impact on the SSI, Archeology and residents. The waste processing proposal should be dropped completely as there is no necessity for a completely new business being proposed purely for profit.

<table>
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<tr>
<th>90736776</th>
<th>Shaun, Lesley, Dominic and Ben Palmer (received via email)</th>
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<td></td>
<td>We are extremely concerned about the resulting increased traffic which will be caused by the development of the quarry at Cavenham. The traffic from the existing facility is already excessive through a small village. Our house is close to Cavenham Road and we already have cracks appearing which we are concerned are as a result of the quarry traffic. The lorries are extremely noisy and they rattle past at all times if the day. If the development goes ahead, there must be policed time restrictions for vehicles 9am - 4pm and traffic speed control measures throughout the village. Our house is on the edge of the village going towards Cavenham but within the current speed restriction, however traffic speeds past, any measures must include the ends of the village rather than just a central point. My youngest son walks to the school bus stop and crosses the road to do so, he and others will need a safe crossing point. The form Suffolk County Council have used is most confusing, hence this email.</td>
<td>The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes. Allen Newport have investigated the relief road and have concluded that it is not something that they wish to pursue.</td>
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<tr>
<th>90739134</th>
<th>Vicky Bright (received via email), Parish Clerk, Tuddenham St Mary Parish Council</th>
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<td>Representation on the Draft Minerals &amp; Waste Local Plan Consultation from the 325 Electorates in Tuddenham St Mary, Suffolk. The Parish Council have been formally charged with submitting a representation on behalf of the residents of Tuddenham St Mary, this representation has been authorized by a Parish Consultation held on 10th</td>
<td>Inert waste/groundwater</td>
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<td>Inert waste is typically waste from construction, demolition and excavation and includes materials such as waste soils and clay. Consultation with the Environment Agency indicates that use of inert waste to restore parts of the site may be acceptable (as it is with the current quarry extraction). It must be</td>
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Policy MS4 sets out in part c) the requirement for an archaeological investigation and part d) the safeguarding of the Black Ditches Ancient Monument. Therefore it can be seen that appropriate steps are being taken to safeguard the historic environment.
July, followed by formal approval at the Parish Council meeting held on 19th July 2018. Residents of Tuddenham St Mary would like to register a formal strong objection to the proposed expansion of the Cavenham Quarry as shown in the Draft Minerals & Waste Local Plan. The area proposed for the extraction is part of the Breckland Farmland Site of Special Scientific Interest. It is believed that the proposed expansion will have a significant negative impact both on the environment and the quality of life of people living in the locality. Residents also have grave concerns about the proposed introduction of the dumping of so called “inert waste”. This has been insufficiently thought out, explained and appears to be entirely profit driven with no recognition given to the impact that again this will have on the environment and the quality of life of people living locally.

We have not had the time to explore and comment on the number of issues that potentially arise from such a proposed expansion in scope. Concerns have already been raised concerning the quarry activities but have consistently been ignored. The current concerns have consistently centred on the volume of Heavy Goods Vehicles passing through our villages. Our roads are simply not designed to accommodate the current levels with all of the issues that this creates. And now on the figures provided by Suffolk County Council and the Quarry themselves the suggestion is that now the volume will nearly double. The residents can simply not idly stand by and allow this to happen.

Turning to specifics, the proposed increase in vehicle and HGV movements through the village, will undoubtedly have a negative impact on the already inadequate road infrastructure. There is likely to be an increase from the current daily 100 vehicle movements to a minimum of 180, thus impacting on surface erosion and damage to the C Road through the villages. There is already a significant problem with potholes and surface erosion, along with damaged and sunken drains and manhole covers, which then causes consequent flooding issues. The established that any issues regarding groundwater and use of inert waste can be addressed before planning permission can be granted.

**HGVs**

The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.

Allen Newport have investigated the relief road and have concluded that it is not something that they wish to pursue.

**SPA/SSSI**

An Appropriate Assessment carried out under the Habitat Regulations concludes that an extension to the quarry would extend the benefits derived to wildlife in a similar way the existing quarrying operations have done.
vibrations from the HGV traffic is causing structural and foundation damage to many of the old and Listed properties within the village. The area is a site of special scientific interest, and the heavy HGV traffic flow is having a significant impact on the environment, air quality and noise levels in the village.

There are also concerns that further extraction will impact on the water table and it is felt that extensive Hydrological Surveys need to be carried out before any expansion is considered.

The Parish Council and residents have been campaigning for many years for reduction in traffic flow and traffic calming measures, on what is classified as a C Minor Road. The HGV’s are using the village as a cut through and for access to the A14/A11. The existing roads and infrastructure are inadequate to cope with this, and a further increase would make the quality of life for villagers even worse than it already is. There is currently a significant issue with speeding through the village and further heavy traffic flow would only inflate this problem, which will cause further risk to residents and other road users. It is felt that the surrounding roads are not fit for purpose and Highways should be consulted and carry out impact assessments. HGV’s already have difficulty passing at the Cavenham bend in the village, causing a hazard and inconvenience to other road users. It is quite simply a really serious accident waiting to happen.

The proposed dumping of so called inert waste will be the major cause of the increase in volume of HGV’s. There are also concerns that the Recycling part of the proposal will increase noise and harmful air pollution within the village, and the risk of contamination to the water table. It should be noted that Air Quality for Tuddenham is currently taken in Newmarket, and we ask that air quality be monitored in the village itself as a condition of any approval. We would strongly advise the removal of the Recycling Scheme from the proposal, or confirmation that any conditions of approval include strict regulation on the types of waste and materials being brought in and
processed, including to ensure that the characteristic free drainage of the soil required by Stone Curlews is not compromised, to ensure the proposed restoration to Breckland Heath is successful. There is of course the option of a link road (which already exists) which could be improved and made fit for purpose, between the current Water Works and Higham Road. If this is made mandatory for all vehicles using the quarry for whatever purpose, this might help to alleviate some of the increase in traffic flow. We strongly feel that before any approval of the proposal is granted this option should be fully investigated and a specified as a condition of approval. There also needs to be a detailed Traffic Management Plan in place.

| 90742892 | Mr Philip Strachan | No | No | Yes | It does not take into full environmental considerations, especially protection of species and the Water Framework Directive. Water flow and pollution studies with regard to the River Lark. Protected species impact to every species listed as having protected status. |

| 90748615 | Mr Philip Strachan (received via email) | - | - | - | Suffolk Minerals and Waste Draft Submission Plan Paragraph 11 Proposed extension of Cavenham Sand and Gravel workings. Having read the Suffolk Minerals and Waste Draft Submission Plan I would like to highlight my objections to the above proposal on the following grounds outlined by the headings in the plan. **Geology** This site sits over aquifers that are connected to groundwater extraction for agriculture and close to aquifers for domestic use. Aquifers also feed the River Lark, one of the few remaining chalk streams in East Anglia. The use of inert waste as backfill will create a potential hazard to groundwater as at times of high volume dumping the integrity of the waste cannot be guaranteed to be free from contaminants. The high silt content of the extracted sand and gravel and **Water resources** The implications for the underlying groundwater source protection zone and controlled waters of extraction and infilling would need to be adequately addressed as part of a planning applications as required by Policy MS4. **Traffic** The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes. Allen Newport have investigated the relief road and have concluded that it is not something that they wish to pursue. | Policy MS4 part "j" states that any implications the quarry may have on ground water resources and controlled waters must be addressed as part of a planning application. Part "e" of the policy requires that the planning application must assess and address impacts on European Protected Species, Priority Species, Priority Habitats, Stone Curlew, Woodlark and Nightjar, as well as implications to designations such as the SSSI and National Nature Reserve. |
resulting washing substrate will also be a risk to the River Lark.

Development Plan and planning applications
There is currently planning applications in place for housing development of the old school and village hall in Tuddenham. Increased traffic associated with this will add to the intrusion of traffic noise and access of traffic associated with the proposed pit extension. The pit extension proposal also does not take into account any future development plans that may affect the villages of Tuddenham and Cavenham. House values will also be affected.

Highways
Approach roads to Tuddenham and the proposed pit are minor roads (Suffolk County Council Class 4a). As such, not suitable for excessive flow of large heavy vehicles. Maintenance is not high priority with Suffolk County Council and pot holes and collapsed drain and inspection covers are a continual feature of Tuddenham High Street. Access to the A11 west through the village consists of street with many parked cars, dangerous junctions and ongoing inadequate planning for an A14 – A11 link. This route through the village is also a designated emergency route for ambulance, police and fire service. High volumes of agricultural traffic is also a feature of this area. This will make any further increase in heavy vehicles untenable with an increased accident risk.

Historic Buildings
St Marys Church, Tuddenham, and St Andrews, Cavenham are listed medieval churches. An impact assessment of increased traffic on the footings and integrity of these buildings must be carried out.

Archaeology
As outlined in the proposal document the area is rich in evidence of Neolithic, Bronze Age and Roman occupation. The importance of the site as a historic WWII airfield should also be noted. The proposal states that no systematic investigation of the large site has taken place. A full scale investigation must be carried out before any work is started.

Ecology

Property prices
House values are not a planning consideration.

Historic buildings
It is unlikely that historic buildings within Tuddenham would be affected.

Archaeology
Policy MS4 would require appropriate archaeological mitigation as part of a planning application.

Ecology
Policy MS4 would require appropriate ecological mitigation as part of a planning application including a project level Apprpriate Assessment. An existing Appropriate Assessment already concluded that an extension to the quarry would extend the benefits derived to wildlife in a similar way the existing quarrying operators have done.

Noise and Air quality
Policy MS4 requires that proposals for noise and dust mitigation measures be proposed as part of a planning application.

Flooding
The northern most part of the site is within Flood Zone 2 (between 1 in 100 and 1 in 1,000 annual probability of river flooding). Minerals working is classed however as water compatible development. The infilling with inert materials is classed as more vulnerable. The Environment Agency consider the use of inert materials to restore the site appropriate.
The impact on the surrounding environment and wildlife conservation areas will be dramatic. These areas are listed in the proposal document but include Cavenheath Heath NNR, several Scientific Sites of Special Interest, Breckland SAC, and habitats for several European protected species. Several nationally important Priority Habitats and Priority Species will be adversely affected by the proposed expansion. The River Lark already takes pumped water from the existing site and this silted water has disrupted the gravel beds needed for the successful breeding of the native brown trout and migratory species such as brook lamprey. The extracted material is noted as having high silt content (7%), this is washed out and has to go somewhere. The Lark Angling and Preservation Society have done much to restore the river in recent years with work to improve flow and reinstate gravel beds. Water pumping from new workings will have a major and detrimental impact on the River Lark. (refer to the Lark Angling and Preservation Society and the River Lark Catchment Project). The Stone Curlew, a bird listed as Annex 1 on the EU Birds Directive (the highest level of protection), has bred in recent years on the farmland to be developed (refer to the RSPB). If for no other reason other than the adverse impact on the local environment, the wide scale development of this should not go ahead.

Air Quality
The major impact on air quality will be from dust particles and any potential odour from landfill or fumes from heavy plant and HGVs. Any wind from an easterly direction will cause dust, fumes and odour to blow directly over Tuddenham village. From a northerly direction this will affect Cavenham. This does not seem to be well dealt in the proposal, quote “the number of HGV generated by the proposal is not currently known ..” Air quality is a big unknown and full scale investigation is required to assess impact on the residents of the two villages and the adjoining wildlife areas. This assessment should be published for local scrutiny.

Noise
There is already a noise issue with plant movement at the existing site. Reversing warning sounders and HGV’s (empty ones are the noisiest through the village) can be heard on a daily basis. The increase in vehicles and earth moving equipment will be massive, especially as the pits are opened up. The backfilling with waste will bring another layer of vehicle movement into contact with the villages. I cannot emphasise enough how damaging noise pollution can be to the wellbeing of the nearby residents.

Water and Flooding
Any exaction at this site will undoubtedly affect the water table and movement of surface water within the Lark catchment. Groundwater Source Protection Zones are affected by this proposal. This development should have no impact of water resources. If it does, or there is a risk of adverse impact during periods of abnormal weather, the proposal should not go ahead.

Conclusion
I strongly object to the proposed extension for Cavenham Pit as laid out in paragraph 11 of the Suffolk Minerals and Waste Draft Submission Plan dated June 2018. I disagree with the Policy statement MS4 for Cavenham that the proposal will be acceptable as the conditions laid out cannot be met. The biggest objection has to be from an environmental prospective.

<table>
<thead>
<tr>
<th>90761254</th>
<th>Ms Annabel John</th>
<th>No</th>
<th>No</th>
<th>No</th>
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<td></td>
<td>Cavenham cannot sustain 100% HGV increase. Road is too narrow with dangerous bends. There would be damage to property and most certainly endangers human safety. Blind growth must not ensue to the detriment of people’s homes and safety. This is undemocratic and unlawful. The proposed plan also will also add carbon emissions to an SSSI site which neighbours the proposed site. The heathlands have a rare and unique acid content to the soil. Another point regarding lorry traffic is that lorries frequently speed into and through the village.</td>
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As stated in paragraph 11.21 of the plan the number of HGVs from the site is not known. If the levels of HGV traffic are similar to the current levels this would be acceptable. If different levels of traffic are proposed the effects on the highway including the safety of all highways users and amenity of residents must be taken account of, as required in part "a" of "Policy MS4: Cavenham".
| Petition | 90765564 | Tuddenham St Mary Petition Claire Unwin | - | - | - | 135 of us feel very strongly that the proposed expansion of the gravelworks, and the addition of the recycling plant, is being put forward despite the obvious detrimental effect it will have on the village of Tuddenham St Mary. We are unsure whether the failure to mention the increase in HGV traffic in the document, and therefore bypass the need to take it into consideration, is an unfortunate oversight or an intentional one. Either way, it makes the MS4 document unsound as it is not factually correct. To be told there will be an over 80% increase in HGV traffic during a public meeting, and then to find this information missing in the related document is not acceptable and shows a lack of even passing consideration for the village. We feel incredibly let down.

We have also had conflicting advice on the process of replying to the consultation. However, we have chosen to follow the official government advice, which is that if there is a group of people with the same opinion, they should submit 1 document, rather than separate ones (Point 4. General Advice on Public Representation Form). As such we expect this letter to be treated as equal to the 135 Public Representation Forms we would have submitted had we acted individually.

Objection to Policy MS4 on grounds that it is unsound.
This document has been produced following the guidance (para 4.2 ‘Where there are groups of people who share a common view, it would be very helpful for that group to send a single representation……’) on the Suffolk Minerals & Waste Local Plan Publication Stage Representation Form. We the undersigned regard the proposal set out for the Cavenham Gravel Works in the Suffolk Minerals & Waste Local Plan June 2018 to be Unsound.
We have been told by officers of the County Council responsible for minerals and waste (meeting 20th June 2018 at Tuddenham Village Hall) that HGV traffic is inappropriate for the amount of HGVs. And is already at its capacity.

The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes.

Allen Newport have investigated the relief road and have concluded that it is not something that they wish to pursue.

The definition of a positive impact on traffic in the Sustainability appraisal (objective 24: to promote efficient movement patterns in the County) is that the proposal has no objection from County Highways Authority and access is directly onto the Suffolk Lorry Route Network. The site meets both of these criteria. Policy MS4 part “a” requires any planning application to address the safety and amenity issues presented by increased HGVs.

Air quality impact due to an increased level of HGVs is required at the planning application level. This is currently the plan stage of the proposal, which is why this assessment has not been included. It will be expected with any planning application submitted.

The use of Air Quality Management Area Newmarket is not intended to be a direct measure of air quality within the vicinity of Cavenham Quarry. It is mentioned to demonstrate that there are no identified statutory air quality issues within the vicinity of the quarry. Policy MS4 requires that a planning application must include an assessment of air quality as a result of the proposals and mitigation to address any issues raised. As previously mentioned, if traffic from the quarry exceeds 100 HGVs each day an assessment of air quality issues stemming from the increased traffic will be required.
frequency related to the extended gravel works and proposed recycling plant will increase by 40 vehicle rotations (80 lorry trips). At this same meeting it was stated that an estimated total of 100 lorries currently pass through the villages of Tuddenham and Cavenham daily. The increase therefore would bring the daily total to at least 180 lorry passes per day. An 80% increase.

The information given in the plan does not acknowledge this in any way. Not only is the obvious effect on the traffic and thus the residents disregarded, it is presented in an entirely false and misleading light.

Table 41 shows the proposal to have a positive effect on traffic impacts, health and wellbeing and public nuisance.

Moreover Table 54, point 9 states: “There are no perceived effects of traffic on the environment at this stage, in line with the Council’s air quality assessments and the lower threshold of expected HGV movements”. In light of the public communications we have received confirming increased HGV frequency, which all the undersigned can confirm, this statement is at best extremely misrepresentative of the facts.

A publicly declared expectation of an 80% rise in HGVs through two small villages, both of which have houses directly on the road, and no infrastructure to deal with the added stress on the road and the buildings, does NOT equate to “….no perceived effects of traffic..” and most certainly does not equate to a positive impact as stated in Table 41.

The effects to the local community would be obvious had a thorough assessment been made.

Both Cavenham and Tuddenham are populated by young families and elderly residents. The dangers of HGV traffic is well documented, especially where pedestrians and cyclists are concerned, and particularly in vulnerable age groups. In both villages the pavements are narrow and in some places non-existent, and residents need to stand in or very close to the road in order to access their homes. The danger of this directly correlates with the amount of
traffic, particularly with HGVs, being slower to respond and having poor visibility compared with cars. Not only does the increase in traffic pose immediate threat to residents, there is also the ongoing damage caused to local roads by the weight of HGVs. Again, with an increase in HGVs this problem will become more severe. Regardless of the proposed route's status as a lorry route, our local roads are C roads and are not withstanding the current levels of HGV traffic, let alone sustaining an increase. Potholes have been a dangerous, prolific problem on our roads putting cyclists, motorcyclists and car users alike at increased risk, and causing damage to vehicles. Residents with houses on the roadside to these routes will experience a significant decrease in air quality from the increased traffic, and from the dust and sand which inevitably falls from the HGVs. Again, these are primarily young families and elderly residents, who will be left with lorry fumes and debris coating their houses. As previously stated, the estimated increase in lorry traffic is up to 100%, bringing the number of lorries passing through Tuddenham and Cavenham to approximately 200. Table 54 point 9 states: ‘Should HGV movements exceed 100 movements a day, then the impacts will have to be assessed through an air quality assessment at the planning application stage’ No such assessment has, to our knowledge, been commissioned despite the projected increase in HGVs. The report refers to the nearest Air Quality Measure being in Newmarket. To use measurements from Newmarket to indicate the local impact of traffic on air quality is completely inappropriate. Common sense dictates that an increase in traffic flow decreases air quality, and while the effect may not spread to Newmarket (10 miles away) it will certainly negatively impact the residents along the lorry routes in both villages. In summary, we the undersigned feel that the increase in HGV traffic related to the proposal will produce a significant reduction in the quality of life for...
| 90767741 | Mr & Mrs Richard & Amanda Spence (received via email) | - | - | - |

I would like the following issues to be taken into consideration with regard to this proposal please:-

**TRAFFIC GENERATION AND HIGHWAY SAFETY**

My understanding is that HGV vehicles will increase by approximately 80 - 100 per day. I am worried about the increase in pollution. I am not aware that an air quality monitoring assessment has been conducted within the village to establish current pollution levels given that the village is situated between two major A roads and is used as a link road despite being a C road. My understanding is that the air quality of Newmarket is being used to benchmark our village in terms of air quality. Tuddenham requires its own air quality assessment due to the current vehicular usage (including overhead – not only are we situated between two main trunk roads we are also situated on the flight path to Mildenhall and Lakenheath airfields).

Although the exact number of lorries from this site are not known, if more than 100 per day are expected then an assessment of the air quality impact from additional traffic will be required. The use of Newmarket in reference to air quality is not to use Newmarket as a measure of Tuddenham’s air quality, it is highlight that there is not a currently known air quality issue in Tuddenham.

Allen Newport have investigated the relief road and have concluded that it is not something that they wish to pursue.

It is considered unlikely that continued routeting of HGVs through the village would cause structural damage to listed buildings.

Site phasing should minimise the impact of the operations on ecology, by ensuring only part of the site is extracted at one time. A restoration scheme and
Given airborne pollutants accumulate quickly on cars and houses currently, this really needs to be established before deciding whether this proposal should go ahead with a view to the health and well-being of the residents of Tuddenham due to the increase in dust/particular air-borne matter. The "C" road or bridge near Tuddenham Mill is not designed or structured to carry the volume and type of traffic currently using this road as can be evidenced by the sinking storm drains and frequent water leaks. The road is not sufficiently wide enough and there is on road parking all along the High Street which makes it difficult for vehicles and pedestrians to navigate safely currently. The risks will only increase if this proposal goes ahead as planned. I am also concerned at potential delays caused to emergency vehicles who use this route currently.

**PLEASE CONSIDER CONDUCTING AN AIR QUALITY ASSESSMENT WITHIN TUDDENHAM AND PUBLICISE THE RESULTS PRIOR TO APPROVING THE PLAN**

**PLEASE CONSIDER BUILDING A BYPASS/ALTERNATIVE LINK ROAD OR RAIL CONNECTION WITH A CONDITION WHICH STIPULATES HGV'S MUST USE THIS ROUTE.**

**EFFECTS ON LISTED BUILDINGS**
I am concerned that increased HGV traffic will cause structural damage to my listed property which is situated less than 2 metres away from the edge of the road. Other listed buildings are adjacent to the High Street and will also be at risk.

**PLEASE CONSIDER BUILDING A BYPASS/ALTERNATIVE LINK ROAD OR RAIL CONNECTION WITH A CONDITION WHICH STIPULATES HGV'S MUST USE THIS ROUTE.**

**NATURE CONSERVATION**
I am concerned about the impact upon the wildlife in the local area particularly the stone curlews which are well established in the area

**PLEASE ENSURE THAT WASTE IS NOT TOXIC TO THE WATER COURSE OR LOCAL ENVIRONMENT AND THE SITE AREA IS**

ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which includes the nearby National Nature Reserve), must be submitted as part of any planning application for the site.

An Appropriate Assessment of the Plan has been carried out and concluded that the restoration of the quarry is likely to result in an ecological benefit in the same way as the existing quarry has.

Assessment of the effects upon water resources is required, as part of the planning application. SCC has been in consultation with the EA regarding ground water issues (amongst others) who have made clear how this site should be worked in order to be acceptable in relation to ground water implications. Consultation with the Environment Agency indicates that use of inert waste to restore parts of the site may be acceptable (as it is with the current quarry extraction). It must be established that any issues regarding groundwater and use of inert waste can be addressed before planning permission can be granted.

A detailed noise assessment is required as part of any planning application for this site, which should identify the appropriate mitigation to make noise acceptable for public amenity. Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites.
| 90768677 | Mr Douglas Symes (received via email), D.K. Symes Associates | Yes | No | Yes |

The outline of the development focuses on the activities at Cavenham Quarry and not the Proposed Development area. The comments need to allow greater flexibility to allow the proposed site to be developed independently of the existing Cavenham Quarry as indicated by Policy MPS. For example, the development of a ‘replacement’ quarry to Cavenham could be phased such that it follows completion of mineral extraction at Cavenham Quarry thereby maintaining a supply from this proposed site. It is this flexibility that is needed to ensure soundness that this proposed site will be developed to contribute to maintaining a supply of sand and gravel through the Plan period.

The Plan considers the area allocated by policy MS4 as an extension to Cavenham quarry. SCC would have no objection to the site coming forward independently of the existing operations. However cumulative impacts would need to be considered with policy MP5 of the Plan.

See Link to Representation here:
<table>
<thead>
<tr>
<th>Reference</th>
<th>Name</th>
<th>Email Status</th>
<th>Phone Status</th>
<th>Email Status</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>90820851</td>
<td>Mr Andrew Wilson</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>I would very much like to put forward my strongest objections to the proposed quarry expansion in the Cavenham/ Tuddenham area. The increase in HGV vehicles through either village will have an enormous impact upon anyone who lives close to the main road both in terms of health risk and damage to roads and property. I understand there may be a possible alternative route from the quarry over what used to be Tuddenham airfield? This would alleviate some issues including further contesting what essentially is a C road which clearly is not suitable for heavy and prolonged vehicle movement. Allen Newport have investigated the relief road and have concluded that it is not something that they wish to pursue.</td>
</tr>
<tr>
<td>90890495</td>
<td>Mr Alan Murfitt</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>I wish to object to the proposed expansion of the quarry for the following reasons:- 1. The increase in heaving traffic through the village of Tuddenham St Mary. 2. The impact on the environment i.e. extra noise, dust &amp; pollution. 3. The safety aspect of residents. 4. The effect on wildlife. 5. The damage to property caused by vibration along the main High Street. 6. The C class road is not suitable for the size &amp; weight &amp; speed of the lorries. A link road between the A11 &amp; A14 with direct access to it from the pit thus avoiding local villages would be a solution &amp; immediately improve the quality of life for residents of both Cavenham &amp; Tuddenham. The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes. Allen Newport have investigated the relief road and have concluded that it is not something that they wish to pursue.</td>
</tr>
</tbody>
</table>

At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, which will include dust management. Earth bunds with vegetation will be required around the boundaries of extraction areas in order to reduce noise to within acceptable levels. This is standard mitigation for sand and gravel quarry sites. A detailed noise assessment is required as part of any planning application for this site, which should identify the appropriate mitigation to make noise acceptable for public amenity. Site phasing should minimise the impact of the operations on ecology, by ensuring only part of the site is extracted at one time. A restoration scheme and...
ecological mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations (which includes the nearby National Nature Reserve), must be submitted as part of any planning application for the site.

An Appropriate Assessment of the Plan has been carried out and concluded that the restoration of the quarry is likely to result in an ecological benefit in the same way as the existing quarry has.

This site is access is on a road that is part of the Suffolk Lorry Route Network. classified as a local access route.

| 88431787 | Cllr Karen Soons | - | No | - | The 100% increase in lorry movements when the road is in constant disrepair, sunken drains with dangerous grills protruding. Sunken areas by the church entrance and bus stop meaning that residents are soaked every time a lorry or vehicle goes past. These do not meet the HMOP intervention criteria so are not fixed. Buildings and flint walls are cracked by the vibrations of current lorry movements. A 100% increased of lorry movements will mean potential lawsuits against the council for not adequately stopping foreseeable damage to property and walls. There must be a limit on the heavy goods vehicles on a C class road through a village that already takes cut through traffic from the A14-A11. What traffic counts have been done on A14/A11 traffic already using Tuddenham as a cut through? Take Cavenham quarry out of the local plan |
| 90407410 | Mr Shaun Fox | No | No | No | - | The existing access arrangements are considered acceptable based on existing flows. Further assessment would need to be undertaken if a significant increase was proposed within a new planning application that included for example the backfilling of the quarry with inert wastes. |

13. **LAYHAM**

*Policy MS5*
<table>
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<th>Reference Number</th>
<th>Respondent</th>
<th>Representation</th>
<th>SCC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>90740351</td>
<td>Mr Steve Merry (received via email), Transport Policy and Development Manager, Suffolk County Council</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>90559825</td>
<td>Beverley McClean (received via email), AONB Planning Officer, AONB Team</td>
<td>-</td>
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to ensure that the policy in the MWLP is legally compliant and sound.

1. The Policy could however include reference to the presence of the AONB 300m of the site in the landscape criterion and seek relevant assessment and possible mitigation requirements as a result.

2. Both the appraisal of the site within Section 10 of this Report and the Council’s independent site assessment highlight the evidence of low density and low complexity later prehistoric activity identified by archaeological investigations undertaken in connection with previous phases of extraction, lying north of the proposed extension to workings. The Policy does not include the requirement for an archaeological investigation and possible appropriate mitigation and the inclusion of such a requirement is recommended.

Policy MS5 has not been amended to reflect the recommendations of the SA with regards the need for a relevant assessment and suitable mitigation. The Partnerships consider that further amendments are needed to policy MS5 to reflect the recommendations of the SA to ensure that impacts on the setting of the AONB are properly considered.

The recommendations of the SA with regards the need for archaeological investigations and the identification of any necessary mitigation also have not been carried forward into policy MS5. While the supporting text in paragraph 12.9 identifies the need for archaeological investigations it does not reference mitigation.

As before, the Partnerships consider that policy MS5 would be strengthened by the inclusion of a criteria identifying the need for archaeological investigations and any appropriate mitigation.

**Proposed modification to policy MS5**

The Partnerships’ preferred modification would be the removal of the Layham allocation from the Submission SMWLP as it falls within the setting of the Dedham Vale landscape impacts. Low level restoration occurs when there is limited or no backfilling of a site with other material (such as inert waste) and the land is restored at a physically lower level than before the extraction. The bunding is filled back into the extraction area to "smooth over" the edges, creating a shallow dish effect, which is an acceptable form of mitigation and will also include the retention of landscape features such as field boundaries and hedgerows;

- the SCC Archaeological Service has been consulted at each stage of plan making. The presence of archaeological potential is recognised in paragraph 12.9 and the recommendation to approach this is through condition.
AONB. Adequate assessments have not been completed to date and we do not consider that the inclusion of the site has been adequately justified by robust evidence.

If, however, the site is to be included in the Submission SMWLP, then the following modifications are considered necessary to policy MS5

a) a progressive working and low level high quality mitigation and restoration scheme, informed by a detailed Landscape and Visual Impact Assessment (LVIA), that is sympathetic to the surrounding landscape character and wider Special Landscape Area and to the setting of the Dedham Vale Area of Outstanding Natural Beauty.

Given that the proposed mineral site at Layham is located within the setting to the Dedham Vale AONB, then mitigation and restoration should be of a higher standard than that normally implemented.

b) an archaeological field evaluation, and deposit modelling, prior to the granting of any planning permission to allow for preservation in situ, where appropriate, and to allow archaeological preservation or mitigation strategies to be designed.

Further advice should be sought from Suffolk County Council’s archaeological unit for further modification to the above suggested policy wording.

The above changes are considered necessary to ensure that the Submission draft of the MWLP will have been supported by robust evidence which delivers sustainable development and to ensure that it is compliant with the National Planning Policy Framework paragraphs 14, 115 and 129 of the NPPF.

| 90284630 | Mrs Sarah Partridge (received via email), Clerk | Kersey Parish Council has reviewed the above consultation and has the following comments to make: 1. There was concern at the number of lorry movements (150 per day) at the Layham quarry, which is close to an At this stage SCC highways currently considers that the access arrangements are suitable. Throughout the plan there are references made to the |
Area of Outstanding Natural Beauty and Special Landscape Area.
2. It was agreed Layham quarry is not a suitable site for potential landfill once minerals have been extracted.
3. The Parish Council consider that the National Planning Policy Framework is not taken into account in this consultation document.
4. There are no links to building waste. It was felt the County Council should be working together with local businesses and private enterprise to improve recycling and encourage local companies to use Council facilities for waste disposal which should reduce fly-tipping which is becoming a considerable problem in rural Suffolk.

National Planning Policy Framework and the National Planning Policy for Waste, however it should be noted that the Suffolk Minerals and Waste Local Plan avoids duplication of policy already set out in these documents.

The use of building waste as recycled aggregate is encouraged within the plan. Paragraph 4.10 outlines the spatial strategy for minerals and waste in Suffolk, and parf "I" states that “aggregate recycling facilities should be located with suitable access to the road network and to centres of population and therefore sources of waste.” The aim of this is to enable the recycling of building materials into useful aggregates.

90633607 Mr Steven Blakeley (received via post) No
1. Layham Quarry has not been operational for a number of years and, so far as we are aware, there are no proposals to bring the site back in to production. Given this and the fact that the operator has not chosen to develop the Site during the life of the current plan, it begs the question as to whether it is likely that the Site will be worked within the Plan period. A case in point is site P25, Overbury Hall as defined in the Minerals Local Plan 1999 which still has not yet been worked and, if we are to believe what is presented to us, has a reserve of 1.2Mt (saleable). Almost 20 years after inclusion in a Plan and for all intents and purposes this deposit at Layham r remains in the ground. Expanding this argument further, if the saleable and planned reserves which remain are extracted at the forecast rate of 100,000tpa (as per the Site within the SSR) then operations would have to commence now in order for the Site to become operational by 2030 as per the representations made in support of this proposal. As can be seen, and by making reasonable assumptions based on the information provided by the operator, it is easy to form a conclusion that the most likely outcome for the Site is that it will not be worked within the Plan period. The County Council's suggestion that it is not unusual for a site to go unworked for a long period of time does not address the fact that there are other sites with better quality material (see next point) which have been very worked in the future.

2. The quality of material in sites does vary across the Suffolk, however gravel content does tend to be low. The quality of material in Layham (23% course aggregate) is similar to the Wetherden extension (27% course aggregate) and does not have the lowest proportion of course aggregate of sites in the plan, which is the Tattingstone extension (4% course aggregate). It is acknowledged that the fines content is relatively high.

3. The Local Aggregate Assessment states that the housing delivery accross Suffolk is approximately 35% lower than planned. Increasing housing delivery is an aim of Government and local government so it is possible that sales of aggregates could increase to meet this demand. While this quarry is within quite a rural area it is not an unreasonable distance from towns where development could take place, such as Ipswich and Hadleigh. In terms of infrastructure it is envisages that a mobile processing plant would be utilised.

4. SCC does not consider the infilling the site with inert waste is necessary, at this stage, in order to provide an
busy. This Site appears to be very much at the bottom of the list and its inclusion in the Plan is not justified.

2. Further doubt is cast upon the likelihood of the Site being worked by the geological information provided within the SSR at Appendix 2. In that, it is confirmed that the material contained within the Site is fundamentally finer than the traditional materials to be found at Layham. It can be seen that 57.6% of the tested material passes the 600µm sieve or, in other words, 57.6% of the material is fine sand and silt. Given this exceptionally poor quality material at the Site, it begs the question if the material will ever be exploited and it further begs the question as to how accurate the quoted and estimated reserve figure is. These uncertainties are expressed by the Quality Control Manager in the appendix to the SSR. The conclusion to be drawn from these comments, which is supported by the failure to work the Site for such a long period, is that this Site is much less viable than the other qualities which have been busy. This is why the Site is bottom of the list for exploitation.

3. Additionally, while the operator cites the economic downturn for failing to pursue the Site within the current Plan period, it is more likely that the geographic remoteness of the site, the poor quality material, the significant amount of investment needed to the processing plant and infrastructure and better reserves held elsewhere by the operator are the reasons for the quarry being left dormant. This is in the context of all other quarries within the County being very busy, with a record number of houses being built and with a government committed to built development. The evidence of the period since the last plan was adopted is that this Site is very much one of last resort, and its continued inclusion in this Plan is not justified.

4. The representation made by the operator is also uncertain in respect to its ability to achieve a satisfactory restoration which is at odds with the view held by Suffolk CC. The operator states that an unspecified type of waste may need to be imported to acceptable restoration, however would not necessarily be against use of inert waste as part of a restoration scheme. The restoration scheme will be agreed upon at the planning application stage.

5. The mitigation that is expected at this stage is an earth bund with planting and a buffer area in order to mitigate against noise, dust and visual amenity. Policy MSS contains criteria that must be met in order for the site to be granted planning permission. These include: working and restoration sympathetic to the AONB and SLA; assessment and addressing of residential amenity; assessment and addressing ecological impact, specifically on European Protected Species (including Dormice, Otters, Bats, and Great Crested Newts), priority species, and priority habitats (such as hedgerows).

6. The site complies with the stated site selection criteria and therefore has been included.

7. SCC normally apply a planning condition to quarries as standard, requiring vehicles operating on site to use white noise reversing alarms.

Typical working hours of a sand and gravel quarry are 7am - 6pm during the week and 7am- 1pm on Saturdays, with no operations on Sundays. This is usually secured by planning condition.

It is expected that the existing access arrangements will be used. The current washing and grading plant location are also expected to be used.
achieve restoration but Suffolk CC state that no waste will be needed. How can this planning authority holds a different view anyway? There seems to be confusion here between the County Council and the contractor.

5. An exceptional amount of land is required for areas of proposed environmental mitigation to make the development acceptable yet it is not stated what this may be. Bearing in mind its obvious importance, it cannot be sound to simply state that such an amount of mitigation will be required and then not know what that may be or the impacts of that mitigation on the environment. This is especially relevant to the SPA and the AONB, not to mention our property and our enjoyment of it. The need for a considerable amount of land to mitigate the impact on ecology and the landscape only emphasises the point that the Site is unlikely to be viable as a result of the poor quality of the material within it.

6. On the basis of all of the above, I am of the opinion that the approach being taken in respect of this Site is not sound and the reality of the matter is that the material is of insufficient quality, is geographically removed from the market, there are uncertainties as to restoration and unknown and potentially material impacts on the environment which have not been considered in sufficient detail.

7. Notwithstanding the above, if the Site is to be worked, then there are several issues which need to be addressed in the form of planning conditions and other actions to protect our property and our enjoyment of it from the proposed extension of Layham Quarry. Not all of these can wait to be dealt with at the planning application stage if they are to be effective.

(A) In addition to earth bunds, advance planting of trees and hedges will be required in the standoff buffer area to protect the outlook from our property and to help protect the property from noise, dust and visual pollution and intrusion. To have any chance of being sufficiently established to have an impact, that planting realistically
needs to take place now, or in any event, at least 10 years in advance of any development of the Site.

(B) The draft plan refers to the creation of eavilh bunds as barriers as part of the noise mitigation measures. These bunds need to be at least 3 metres and possibly 5 metres in height.

(C) All vehicles visiting the Site should be required to be fitted with white noise reversing alarms which respond to the environment. This must apply to vehicles used by all sub-contractors as well as the operator.

(D) The Site Selection Report includes a plan showing that the operator intends to work the Site in two phases - the first from north to south and the second from west to east. The entire Site should be worked from north to south so that the operator's (or its sub-contractor's) equipment is hidden by the topography.

(E) The separation distance from our property to the extraction area as shown in the draft plan is inadequate and should be extended on both affected sides of our property to no less than 150 metres. The County Council conceded in their response to our comments on the Preferred Options draft of the Plan that an additional stand-off is expected to be required at this Site. This gives further weight to the arguments questioning the viability of this Site raised in paragraphs 1-3 above.

(F) We can see no justification for working the Site at a weekend or on a bank holiday. This should be forbidden.

(G) To ensure that our property is fully protected from air pollution, air quality modelling for the full range of particulate emissions arising from the Site during the life of the development must be carried out and assessed for compliance with all relevant regulations with appropriate mitigation being implemented.

(H) Access to the Site should only be permitted through the existing access arrangements to Layham Quarry.
(I) The washing, grading and processing of aggregates extracted from the Site should only be permitted in the location of the existing plant and infrastructure at Layham Quarry and no new facilities of this nature shall be established on the Site.

(J) The draft plan refers to the potential for impacts upon nature conservation and underestimates substantially the number of species likely to be affected and makes no mention of the impact on plants. We are aware of the presence of dormice and stag beetle within the Site and, consequently, we question how much the presence of these species will affect the operator's ability to work in any event.

The exclusion of the proposed extension of Layham Quarry as a site for minerals extraction from the Suffolk Minerals and Waste Local Plan

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90633607 Mrs Alison Blakeley (received via post) No

1. Layham Quarry has not been operational for a number of years and, so far as we are aware, there are no proposals to bring the site back in to production. Given this and the fact that the operator has not chosen to develop the Site during the life of the current plan, it begs the question as to whether it is likely that the Site will be worked within the Plan period. A case in point is site P25, Overbury Hall as defined in the Minerals Local Plan 1999 which still has not yet been worked and, if we are to believe what is presented to us, has a reserve of 1.2Mt (saleable). Almost 20 years after inclusion in a Plan and for all intents and purposes this deposit at Layham remains in the ground. Expanding this argument further, if the saleable and planned reserves which remain are extracted at the forecast rate of 100,000tpa (as per the Site within the SSR) then operations would have to commence now in order for the Site to become operational by 2030 as per the representations made in support of this proposal. As can be seen, and by making reasonable assumptions based on the information provided by the operator, it is easy to form a conclusion that the most likely outcome for the Site is that it will not be worked within the Plan period. The County Council's suggestion that it is not unusual

1. SCC does not consider that because the site has not been worked yet, does not mean it will not be worked in the future.

2. The quality of material in sites does vary across the Suffolk, however gravel content does tend to be low. The quality of material in Layham (23% course aggregate) is similar to the Wetherden extension (27% course aggregate) and does not have the lowest proportion of course aggregate of sites in the plan, which is the Tattingstone extension (4% course aggregate). It is acknowledged that the fines content is relatively high.

3. The Local Aggregate Assessment states that the housing delivery across Suffolk is approximately 35% lower than planned. Increasing housing delivery is an aim of Government and local government so it is possible that sales of aggregates could increase to meet this demand. While this quarry is within quite a rural area it is not an unreasonable distance from towns where development could take place, such as Ipswich and Hadleigh. In terms of infrastructure it is envisages that a mobile processing plant would be
for a site to go unworked for a long period of time does not address the fact that there are other sites with better quality material (see next point) which have been very busy. This Site appears to be very much at the bottom of the list and its inclusion in the Plan is not justified.

2. Further doubt is cast upon the likelihood of the Site being worked by the geological information provided within the SSR at Appendix 2. In that, it is confirmed that the material contained within the Site is fundamentally finer than the traditional materials to be found at Layham. It can be seen that 57.6% of the tested material passes the 600µm sieve or, in other words, 57.6% of the material is fine sand and silt. Given this exceptionally poor quality material at the Site, it begs the question if the material will ever be exploited and it further begs the question as to how accurate the quoted and estimated reserve figure is. These uncertainties are expressed by the Quality Control Manager in the appendix to the SSR. The conclusion to be drawn from these comments, which is supported by the failure to work the Site for such a long period, is that this Site is much less viable than the other qualities which have been busy. This is why the Site is bottom of the list for exploitation.

3. Additionally, while the operator cites the economic downturn for failing to pursue the Site within the current Plan period, it is more likely that the geographic remoteness of the site, the poor quality material, the significant amount of investment needed to the processing plant and infrastructure and better reserves held elsewhere by the operator are the reasons for the quarry being left dormant. This is in the context of all other quarries within the County being very busy, with a record number of houses being built and with a government committed to built development. The evidence of the period since the last plan was adopted is that this Site is very much one of last resort, and its continued inclusion in this Plan is not justified.

4. The representation made by the operator is also uncertain in respect to its ability to achieve a utilised.

4. SCC does not consider the infilling the site with inert waste is necessary, at this stage, in order to provide an acceptable restoration, however would not necessarily be against use of inert waste as part of a restoration scheme. The restoration scheme will be agreed upon at the planning application stage.

5. The mitigation that is expected at this stage is an earth bund with planting and a buffer area in order to mitigate against noise, dust and visual amenity. Policy MSS contains criteria that must be met in order for the site to be granted planning permission. These include: working and restoration sympathetic to the AONB and SLA; assessment and addressing of residential amenity; assessment and addressing ecological impact, specifically on European Protected Species (including Dormice, Otters, Bats, and Great Crested Newts), priority species, and priority habitats (such as hedgerows).

6. The site complies with the stated site selection criteria and therefore has been included.

7. SCC normally apply a planning conditions to quarries as standard, requiring vehicles operating on site to use white noise reversing alarms.

Typical working hours of a sand and gravel quarry are 7am - 6pm during the week and 7am - 1pm on Saturdays, with no operations on Sundays. This is usually secured by planning condition.

It is expected that the existing access arrangements will be used. The current washing and grading plant location are also expected to be used.
satisfactory restoration which is at odds with the view held by Suffolk CC. The operator states that an unspecified type of waste may need to be imported to achieve restoration but Suffolk CC state that no waste will be needed. How can this planning authority hold a different view anyway? There seems to be confusion here between the County Council and the contractor.

5. An exceptional amount of land is required for areas of proposed environmental mitigation to make the development acceptable yet it is not stated what this may be. Bearing in mind its obvious importance, it cannot be sound to simply state that such an amount of mitigation will be required and then not know what that may be or the impacts of that mitigation on the environment. This is especially relevant to the SPA and the AONB, not to mention our property and our enjoyment of it. The need for a considerable amount of land to mitigate the impact on ecology and the landscape only emphasises the point that the Site is unlikely to be viable as a result of the poor quality of the material within it.

6. On the basis of all of the above, I am of the opinion that the approach being taken in respect of this Site is not sound and the reality of the matter is that the material is of insufficient quality, is geographically removed from the market, there are uncertainties as to restoration and unknown and potentially material impacts on the environment which have not been considered in sufficient detail.

7. Notwithstanding the above, if the Site is to be worked, then there are several issues which need to be addressed in the form of planning conditions and other actions to protect our property and our enjoyment of it from the proposed extension of Layham Quarry. Not all of these can wait to be dealt with at the planning application stage if they are to be effective.

(A) In addition to embankments, advance planting of trees and hedges will be required in the standoff buffer area to protect the outlook from our property and to help protect the property from noise, dust and visual pollution and
intrusion. To have any chance of being sufficiently established to have an impact, that planting realistically needs to take place now, or in any event, at least 10 years in advance of any development of the Site.

(B) The draft plan refers to the creation of ear11h bunds as barriers as part of the noise mitigation measures. These bunds need to be at least 3 metres and possibly 5 metres in height.

(C) All vehicles visiting the Site should be required to be fitted with white noise reversing alarms which respond to the environment. This must apply to vehicles used by all sub-contractors as well as the operator.

(D) The Site Selection Report includes a plan showing that the operator intends to work the Site in two phases - the first from north to south and the second from west to east. The entire Site should be worked from north to south so that the operator's (or its sub-contractor's) equipment is hidden by the topography.

(E) The separation distance from our property to the extraction area as shown in the draft plan is inadequate and should be extended on both affected sides of our property to no less than 150 metres. The County Council conceded in their response to our comments on the Preferred Options draft of the Plan that an additional stand-off is expected to be required at this Site. This gives further weight to the arguments questioning the viability of this Site raised in paragraphs 1-3 above.

(F) We can see no justification for working the Site at a weekend or on a bank holiday. This should be forbidden.

(G) To ensure that our property is fully protected from air pollution, air quality modelling for the full range of particulate emissions arising from the Site during the life of the development must be carried out and assessed for compliance with all relevant regulations with appropriate mitigation being implemented.
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<td>(H) Access to the Site should only be permitted through the existing access arrangements to Layham Quarry.</td>
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<td>(I) The washing, grading and processing of aggregates extracted from the Site should only be permitted in the location of the existing plant and infrastructure at Layham Quarry and no new facilities of this nature shall be established on the Site.</td>
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<td>(J) The draft plan refers to the potential for impacts upon nature conservation and underestimates substantially the number of species likely to be affected and makes no mention of the impact on plants. We are aware of the presence of dormice and stag beetle within the Site and, consequently, we question how much the presence of these species will affect the operator's ability to work in any event.</td>
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The exclusion of the proposed extension of Layham Quarry as a site for minerals extraction from the Suffolk Minerals and Waste Local Plan.
14. **TATTINGSTONE**

**Policy MS6: TATTINGSTONE**

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<tr>
<th>Reference Number</th>
<th>Respondent</th>
<th>Legally compliant?</th>
<th>Sound?</th>
<th>Compliance with duty to co-operate?</th>
<th>Representation</th>
<th>SCC Response</th>
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<tr>
<td>90890511</td>
<td>Mr Alan Abbott (received via post)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>I do not agree that Shotely Holdings should be granted permission to extend there mineral extractions closer to Tattingstone or Bentley. Due to 1. General Noise from the site as is 2. Devaluation of properties close by. 3. Amount of lorry movements at present is high. 10 in and 10 out this is grossly underestimated (at present there could be be much as 100 movements in or out per day) A check on dockets from site or lorry survey on Bentley road entrance could provide this. This C road was never built to accommodate this amount of up to 40 ton lorry's. We should also look at builders sites lorry's/trailers vans since the closing of waste access. We have not used your complicated forms which not many people in Tatt/Bentley are familiar with (is it to keep representations to a low number). We have written this in plain English. I have lived at my present address 50yrs when the view from my land was a beautiful valley now it could be a near mountain in North Wales. As the Bank gets taken higher into the Skyline the only people who will benefit from this build up is the extra amount of M3 of waste soil ect that will be taken to fill in behind the bank. 4. Dust blowing from rubble crusher and general site movements which has not been addressed under current dry spell.</td>
<td>In answer to the points raised: 1. Earth bunds with vegetation will be required around the boundaries of extraction area, however additional standoff areas may also be required in order to reduce noise to within acceptable levels. A detailed noise assessment is required as part of any planning application for this site. 2. Property values are not a planning consideration. 3. The current planning conditions on the mineral extraction site are that the lorries travel north at the A137. As such it is expected the current traffic generated by the minerals extraction will remain similar to the current levels. SCC highways are satisfied that the existing access is adequate for the current level of traffic. 4. At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust suppression measures.</td>
</tr>
<tr>
<td>90762482</td>
<td>Mr Tom Hill, Chairman, The Stour and Orwell Society</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>This is again a very curious and seemingly unnecessary allocation. We are told that modest volumes are being worked annually for “general fill”. Why are we supporting the digging up of low grade sandy deposits to be transported elsewhere to be used as “fill”. This is</td>
<td>Earth bunds, planted with vegetation and a standoff should provide appropriate screening to mitigate the visual impact, air quality impact and noise. The sand also contributes towards the identified shortfall in provision during the Plan period to 2036.</td>
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</table>
completely unsustainable and inert wastes should be used for this purpose.

SOS has no issue with the existing operation which lies largely away from view on the lower contours, reasonably well set back from the road and properties at Tattingstone Heath and well screened by bunds and hedges.

However, this relationship will be fundamentally disrupted if workings are allowed to climb up onto the plateau. They will be highly visible from both the road and the village in an otherwise attractive landscape, protected as a Special Landscape Area. All for 0.9Mt of low grade sand to be used for “fill”. Moreover, this intrusion is planned to last for 23 years! 23 years to extract 0.9Mt is completely unreasonable.

The County Council needs to face up to the reality that this allocation has been promoted in order to create a hole for backfilling and that it cannot properly be considered as a planning requirement to meet the County’s minerals needs. SOS seeks the deletion of this site.

| 90610463 | Mr Jonathan Worsley (received via email), Consultee, PDE Consulting | Yes | Yes | Yes | With reference to the above, we are writing in support of the site at Tattingstone being included within the pre-submission draft documents. | Noted. |
| 90740351 | Mr Steve Merry (received via email), Transport Policy and Development Manager, Suffolk County Council | - | - | - | No additional comments | Noted. |
The proposed quarry extension at Tattingstone is currently located approximately 1.5km from the boundary of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty. The boundary of this AONB is currently under review by Natural England. A proposal has been put forward to extend the Suffolk Coast & Heaths AONB to the south west of Alton Water. If approved, the revised AONB boundary would be approximately 400m south of the proposed extended mineral site at Tattingstone. This would require the allocation of the mineral site extension at Tattingstone to be considered in the context of it being within the setting of the AONB.

The Partnerships acknowledge that the current AONB boundary is located some distance from the proposed mineral site. It is anticipated that within the lifetime of the SMWLP, that the AONB boundary will have been revised, therefore we would urge that a precautionary approach is adopted towards the proposed site at Tattingstone due to the ongoing AONB review.

**Comments on the Sustainability Appraisal (SA) assessment for Tattingstone.**

The SA section for Tattingstone, stated the following: The appraisal of this site within Section 10 of this Report indicates negative or possible negative impacts surrounding landscape, Stour & Orwell SPA, Stour Estuary SSSI, Brantham Bridge Meadows CWS, protected species, archaeology, a bridleway / PRoW, and the proximity of a number of residential properties. The Policy can be seen to address the majority of these impacts suitably, with additional information and mitigation measures requested of any forthcoming planning applications. At the time of writing, a number of comments were made on the HRA work undertaken to accompany the Plan by Natural England.

The Sustainability Appraisal (SA) recommended the following changes to policy SM6 in consideration of the potential impacts highlighted for the site within Section 10 regarding Natura 2000 sites, it is recommended that Bunding is a standard form of mitigation on the site for visual and noise impact (covered in policy GP4), but also perform a function as storage for the overburden (topsoil and other material which is on top of the sand and gravel), as such it is not considered that specific wording for bunding is required in the policy. Removal of the bunding will be required as restoration of the site, and will be used to partially fill in the extraction area.

*The Stour and Orwell SPA is already mentioned in paragraph 13.13, but can also be mentioned in Policy MS6 by modifying clause d) of Policy MS6 to read “potential impacts upon nature conservation interest including trees, ditches, watercourses, the Stour & Orwell Special Protection Area, European Protected Species (Bats), Priority Species, Priority Habitats, which need to be adequately assessed and where necessary mitigation proposed;”*

SCC consider that mitigation for landscape is covered by policy GP4 which includes criteria for considering protected landscapes.
the Policy add further detail regarding the specific assessment requirements of work related to ‘nature AONB Partnerships response Submission SMWLP Page 11 conservation interests’, for instance whether there is a need for a project-level HRA to be undertaken to accompany any forthcoming planning application.

**Proposed modification to policy MS6**

The Partnerships’ preferred modification would be the removal of the Tattingstone allocation from the Submission SMWLP as it located close to the area proposed as an extension the Suffolk Coast & Heaths AONB. The site also falls within the Zone of Influence of the Stour and Orwell SPA. Adequate assessments have not been completed to date therefore we do not consider that the inclusion of the site has been adequately justified by robust evidence and it is therefore premature to allocate it at this stage. If the site is to be retained in the Submission SMWLP, then the following modifications are considered necessary to policy MS6

b) a comprehensive scheme of screening and bunding for the proposed extension, **during the operational phase** only is essential to minimise adverse impacts of the wider landscape of the Special Landscape Area, Area of Outstanding Natural Beauty including the proposed extension area and on local visual amenity;

Bunding is an uncharacteristic and incongruous feature in the local landscape within the setting of the AONB and it is therefore not considered a suitable mitigation measure for inclusion in any proposed restoration scheme for this site.

d) potential impacts upon nature conservation interest including **Stour and Orwell SPA**, trees, ditches, watercourses, European Protected Species (Bats), Priority Species, Priority Habitats, which need to be adequately assessed and where necessary mitigation proposed; The following new criteria is also proposed for inclusion in policy MS6
a) a high-quality mitigation and restoration scheme, informed by a detailed Landscape and Visual Impact Assessment (LVIA), that is sympathetic to the landscape character, wider Special Landscape Area and to the setting of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty.

Given that the proposed mineral site at Tattingstone may in the future be located within the setting to the Suffolk Coast & Heaths AONB, then mitigation and restoration should be of a higher standard than that normally implemented.

The above changes are considered necessary to ensure that the Submission draft of the SMWLP delivers sustainable development and is compliant with the National Planning Policy Framework 14, 109, 115 of the NPPF.

<table>
<thead>
<tr>
<th>90635571</th>
<th>Mrs Jane Connell-Smith (received via post), Parish Clerk, Tattingstone Parish Council</th>
<th>Yes</th>
<th>No</th>
<th>Yes</th>
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<tr>
<td></td>
<td>The site is still too close to housing and possible housing (application with Babergh DC for 10 Houses at Rose House due east on A137). Noise and Dust levels already unacceptable. The extra numbers of vehicular movements in unacceptable. Current vehicular movements do not adhere to time restrictions with many before 7.00am &amp; later than 6.00pm</td>
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<td>Villagers wish that vehicles travelling south exit the site onto A137 by southern route so as to avoid residential area of A137 Tattingstone The Heath. Vehicles travelling north exit site via Station Road so as to avoid The Heath.</td>
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<td>Policy GP4 outlines the general environmental criteria that any minerals planning application must comply with in order to be granted planning permission, which includes both air and noise issues. There are also site specific policies in policy MS6, which require and air quality assesment before the grant of planning permission. There is also a policy requirement for adequate noise mitigation. There are not expected to be an increase in daily lorry movements from this site, as it is expected that the extension will extend the life of the quarry, rather than increase the level of sand and extraction taking place there.</td>
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<td>The application for housing at Rose House (application number DC/17/03388) was refused by the District Council However there is a policy within the plan stating what should occur with regard to sites in the plan that may cause conflicts with other proposed or permitted sites. Policy MP9 states &quot;Any mitigation required falls on the development that receives planning permission last.&quot; This means that if housing was allowed at Rose House the minerals extension would need to provide the mitigation. If other housing</td>
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Suffolk County Council
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<tr>
<th>Name</th>
<th>Comments</th>
<th>Gains planning permission after the permission of the quarry extension it is the housing that will need to provide mitigation.</th>
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<tr>
<td>Mrs Janet Ward</td>
<td><strong>I wish to make the following comments on the above consultation:</strong> The proposed excavation lies very close to the properties on the west side of the Heath (A137) Much noise and dust is already created by the Landfill site and this proposed excavation will make the situation much worse, bearing in mind that we normally have a prevailing westerly/south westerly wind. <strong>Re: Your questions and answers form:</strong> Question no. 3 states: there will be approximately 16 movements per day on average (10 in and 10 out) I make this 20 movements. Assuming there are no return loads this could then double the figure bringing the number of movements to 40. Question no.4 states: Lorries would travel via Station Road to A137 - which direction then? We already have dozens of skip lorries and other lorries connected to the Landfill site travelling along The Heath all the time from 6a.m. to 6p.m. Any extra lorry movements onto the Station Road and Tattingstone crossroads would be totally unacceptable. I wish to object most strongly to this proposed consultation/application.</td>
<td>The proposed lorry routing solution to avoid the Heath is plausible and could be implemented for the minerals extraction if the extension comes forward at the planning application stage. However, it should be noted that a proportion of the traffic from the south of the site (i.e. the skip depot) was granted planning permission by the district council. Because of this it is not possible for the County Council to require all traffic to be routed in the way proposed.</td>
</tr>
<tr>
<td>Bethany Philbedge</td>
<td><strong>The close proximity of the MS6: Tattingstone site to the proposed revised boundary of the Suffolk Coast and Bunding is a standard form of mitigation on the site for visual and noise impact (covered in policy GP4), but</strong></td>
<td>At the planning application stage an Air Quality Assessment will be required, which will identify the measures necessary to make this risk acceptable and protect nearby residents and businesses, and it is expected that adequate mitigation can be provided, which includes dust suppression measures. Earth bunds with vegetation will be required around the boundaries of extraction areas, however additional standoff areas may also be required in order to reduce noise to within acceptable levels. A detailed noise assessment is required as part of any planning application for this site. The document provided at the drop in sessions contained a typo. 20 lorry movements a day is currently what is expected, which is approximately the amount of traffic generated by the minerals extraction (note, not the waste activity on the site). The current planning conditions on the mineral extraction site are that the lorries travel north at the A137. As such it is expected the current traffic generated by the minerals extraction will remain similar to the current conditions.</td>
</tr>
<tr>
<td>(received via email) Planning Officer, Suffolk Preservation Society</td>
<td>Heaths AONB must inform the scheme of mitigation to minimise the landscape harm of the extension to the site. In particular the use of bunds is inappropriate in restoring the landscape as they are an alien feature within this landscape which is in the setting of the AONB.</td>
<td>also perform a function as storage for the overburden (topsoil and other material which is on top of the sand and gravel), as such it is not considered that specific wording for bunding is required in the policy. Removal of the bunding will be required as restoration of the site, and will be used to partially fill in the extraction area.</td>
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## 15. Wangford

**Policy MS7**

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<th>Reference Number</th>
<th>Respondent</th>
<th>Legally compliant?</th>
<th>Sound?</th>
<th>Compliance with duty to co-operate?</th>
<th>Representation</th>
<th>SCC Response</th>
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<tr>
<td>90459841</td>
<td>Mr James Meyer, Suffolk Wildlife Trust</td>
<td>No</td>
<td>No</td>
<td>-</td>
<td>This site is within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and is close to parts of the Minsmere-Walberswick SPA, Minsmere-Walberswick Ramsar site, Minsmere-Walberswick Heaths and Marshes SSSI, Suffolk Coast National Nature Reserve (NNR) and Wangford Marshes CWS. Parts of these designated sites also include Suffolk Wildlife Trust’s Hen Reedbeds reserve. The wider area is also known to support a range of protected and/or UK Priority species and UK Priority habitats. Extraction in this location has the potential to result in adverse impacts on the identified sites, species and habitats either through direct impacts (such as habitat loss) or indirect impacts (such as changes to the local hydrological regime). All such potential impacts must be assessed prior to any allocation of this site, in particular the potential impacts on the SPA and Ramsar site must be assessed as part of the Habitats Regulations Assessment (HRA) for the Local Plan (including any hydrological impacts) and sites should not be allocated which would result in an adverse impact on these, or other, designated sites, or on protected or Priority species. Notwithstanding the above, it must be ensured that should any extraction be allocated in this location, that the site restoration plan maximises the area’s biodiversity value with particular emphasis on species for which local nature conservation sites are designated. We also support the comments made by the AONB Partnerships in relation to this site. It must be ensured that the site is suitable for extraction.</td>
<td>SCC has carried out an Appropriate Assessment of the Plan as a result of the People Versus Wind Decision of the European Court of Justice. The AA has also been subject to public consultation.</td>
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<tr>
<td>90734645</td>
<td>Mr and Mrs James and Emmeline Winterbotham</td>
<td>No</td>
<td>No</td>
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Please see submission dated 23rd July, 2018 (9 parts)


As stated in the plan SCC considers there are exceptional circumstances consistent with paragraph 116 for the following reasons: i) the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy; ii) there is a shortage of gravel in the market area served by this quarry and the proposed extension contains an unusually high percentage of gravel (60%) compared to most other quarries in Suffolk and Norfolk; iii) the market area includes both Ipswich and Norwich and the gravel from Wangford is used to supplement the sand rich deposits from other quarries within the market area including those of rival companies; iv) processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds; v) there are no other acceptable proposed sites within the north-east area of Suffolk; vi) alternative sources such as crushed rock, recycled aggregates and marine dredged sand and gravel are unable to provide a suitable alternative due to availability or economic viability; vii) it is considered that in respect of the impact upon the wider AONB, the recreation within the area, the nearby residential properties and ecological designations, the proposals could be mitigated to an acceptable extent.

This is the outline of SCCs reasoning with the details and evidence presented in Site Selection reports; the geology section of each report summarises the quality and quantity of sand and gravel at each site and the appendices present the geological data. Reports for sites not included in the plan are included in the evidence base to demonstrate that SCC did consider other sites outside of the AONB. No other acceptable sites submitted to SCC during the call for sites, contained material of a high a percentage of gravel as...
Alternative sources such as recycled aggregate, crushed rock, and marine dredged aggregates are considered in sections 4, 5, and 6, of the Local Aggregate Assessment 2018, respectively. While it is the case that aggregate recycling from construction, demolition and excavation waste increased, supplies of this aggregate from this source are difficult to predict as they are tied to construction, demolition and excavation activities. While approximately 9 million tonnes of aggregate are licensed off the coast of East Anglia, relatively small tonnages are landed in Suffolk, with most of the material being landed in London, so this cannot be relied upon to supply Suffolk’s needs, as the market determines where this material is landed. Suffolk does receive importation of crushed rock, however SCC would argue that having a local supply is more sustainable. In the site selection process an extension to Henham quarry was considered and the reasons for excluding this site extension from the plan are set out in the site selection report for Henham. For these reasons SCC considers these exceptional circumstances consistent with paragraph 116 of the NPPF.

It is acknowledged that there will be limited disruption to the AONB and the loss of tranquillity, however this will be temporary, and restoration of the site would restore it to a use with biodiversity gains or return the site to agriculture. It is also acknowledged that there would likely be permanent change to the landform, however this must be weighed against the benefits of the scheme, which is provision of high quality aggregates at a regional level from a more sustainable and reliable source than the alternatives. It should be noted that policy MS7 part "f" does require the retention of linear features such as hedgerows and trees on field boundaries.

SCC accepts that there is a Duty of Regard placed on it by the CROW Act., however the explanatory notes to the CROW Act. states that "The requirement to have
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| 90735503 | Mr and Mrs James and Emmeline Winterbotham | No | No | -


See response to previous representation.

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regard to conserving and enhancing natural beauty will not override particular considerations which have to be taken into account by relevant authorities in carrying out any function.” This includes its function as the minerals planning authority.

While it is acknowledged that there may be limited impacts on specific tourism receptors near to the site, however as the quarry is an extension to a currently existing quarry and the level of activity is not expected to significantly change from the current levels. As a result, the overall impact of the quarry extension is not expected to be significantly different to the current situation.
Policy MS7: Wangford

We consider the plan allocation at Wangford is not fully consistent with the objectives of paragraph 116 of the NPPF and is therefore unsound because insufficient justification has been presented to allow us to conclude that this site presents ‘exceptional circumstances’ for major development within an AONB. In particular, there needs to be a description of the alternatives that have been considered, such as winning the minerals from outside the AONB or meeting the need for the product in some other way.

The Outline Landscape and Visual Appraisal (Cemex 2017, Appendix 2) states that there would be a permanent alteration and large change to the landform and that effects on tranquillity during the operation of the site ‘should not be underestimated’. We consider that appropriate and effective mitigation for landscape and visual impacts is difficult to achieve in this sensitive landscape and the mitigation itself, i.e. screening bunds, will have their own adverse impact. We agree with the comments of the AONB Partnership in relation to this site.

Natural England’s concerns would be overcome if it could be clearly demonstrated that this allocation presented exceptional circumstances which were commensurate with the national designation, no satisfactory alternatives exist and that satisfactory mitigation for adverse impacts at all stages of the proposal could be achieved.

We advise amending the wording in relation to nature conservation to include the following:

d) likely adverse effects (either individually or in combination with other developments) on the notified

Exceptional circumstances are outlined in the Plan in paragraph 14.9, but the detailed information is within the plan evidence base. Each Site Selection Report contains a “Geology” section summarises the quality and quantity of the sand and gravel resources in each site, with detailed geological reports presented the appendices. Site selection reports show that no other acceptable sites containing the high percentage of gravel that is present at Wangford were submitted at the call for sites. Alternative sources such as recycled aggregate and marine dredged aggregates are considered in sections 4 and 6 of the Local Aggregate Assessment 2018, respectively. While it is the case that aggregate recycling from construction, demolition and excavation waste increased supplies of this aggregate from this source are difficult to predict as they are tied to construction, demolition and excavation activities. While approximately 9 million tonnes of aggregate are licenced off the coast of East Anglia, relatively small tonnages are landed in Suffolk, with most of the material being landed in London. For these reasons SCC considers these exceptional circumstances consistent with paragraph 116 of the NPPF. It is noted that these issue were not raised by Natural England during the Prefered Options plan consultaton.

The site is relative flat and screened by existing hedegrows and woodland from the surround AONB. Hence effective screening of the site from the surrounding area is easily achievable and would not rely on bunding as is suggested. The proposed restoration to agriculture and ecology would remove any significant residual impacts.

Cumulative effects of minerals sites with other development is covered in policy MP5 and it would be
special interest features of Minsmere-Walberswick SPA/Ramsar site, Minsmere to Walberswick Heaths & Marshes SAC, Minsmere-Walberswick Heaths & Marshes SSSI and Suffolk Coast NNR,… etc.

Further information on any required avoidance/mitigation measures at this site should be provided within the Plan (cross-referencing to the HRA) as well as indicating the need for detailed project level HRA. Note that in the policy, point d) includes Suffolk AONB under nature conservation interest. The AONB designation is primarily for landscape and visual attributes and we advise that reference to the AONB is removed from this point.

The National Planning Policy Framework paragraph 116 states that planning permission for major development (which includes sand and gravel extraction) within an AONB should be refused except in exceptional circumstances where it can be demonstrated that it is in the Public Interest. It states that such proposals should be considered in the light of an assessment of: the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

NPPF paragraph 144 states that when determining planning applications local authorities should as far as practicable provide for minerals from outside of AONBs. Having appraised the proposed site within the context of the NPPF and other material considerations it was considered justified to include the Lime Kiln Farm within the Plan because of the following exceptional reasons: the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy; there is a

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<th>Reference</th>
<th>Name</th>
<th>Action</th>
<th>Notes</th>
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<tbody>
<tr>
<td>90395181</td>
<td>Mr Mark Watson</td>
<td>No</td>
<td>Noted</td>
</tr>
<tr>
<td>90512115</td>
<td>Mr Mark Watson</td>
<td>No</td>
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The following are among the reasons I consider the plan to extend Wangford Quarry unsound: (i) It would involve unacceptable degradation within a Suffolk Coastal AONB area; (ii) It would destroy and disrupt wildlife habitats (including for curlews, which are on the red list of endangered species); (iii) The beauty and tranquillity of the area will be damaged both visually and aurally; (iv) This side of the estuary would become even more industrial, as an extended gravel pit would add to the existing disruption to the landscape and AONB by the current Wangford pit, Adnams Distribution Centre and Reydon Solar Farm.

I strongly consider that due to the unsound nature of the plan to extend the gravel pit as detailed above, this extension should not be permitted to go ahead. The only ‘modification’ therefore would be to scrap the plan for this extension.

The AA has also been subject to public consultation.

SCC has carried out an Appropriate Assessment of the Plan as a result of the People Versus Wind Decision of the European Court of Justice.
shortage of gravel in the market area served by this quarry and the proposed extension contains an unusually high percentage of gravel compared to most other quarries; the market area includes both Ipswich and Norwich and the gravel from Wangford is used to supplement the sand rich deposits from other quarries within the market area; processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds; there are no other acceptable proposed sites within the north-east area of Suffolk; alternative sources such as crushed rock, recycled aggregates and marine dredged sand and gravel are unable to provide a suitable alternative due to availability or economic viability; it is considered that in the impact upon the wider AONB, recreation within the area, and the nearby residential properties and ecological designations could be moderated to an acceptable extent.

Detailed evidence showing exceptional circumstances can be found in the Local Aggregates Assessment and in the Site Selection Reports, which detail the quantity and quality of material in all sites submitted to SCC, through detailed geological reports. These show that no other sites containing material of equivalent quality were submitted to SCC.

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time.

Possible conditions on planning permission (if granted) are to restore the site to a suitable condition that it can be used by stone curlew, or only extracting outside of the stone curlew nesting season. Site phasing, which means that only a smaller section of the site is worked at a time, before being restored, will also help to minimise the impact on stone curlew as well as other wildlife and the landscape.

It is expected that features such as hedgerows and
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<th>SMWLP Responses to Submission Draft Consultation March 2019</th>
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<td>mature oak trees will be retained due to their biodiversity and landscape value.</td>
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<tr>
<th>90551387</th>
<th>Mr Shaun Denny (received via post), Development Planner, Cemex UK Operations Limited</th>
<th>Yes</th>
<th>Yes</th>
<th>Yes</th>
<th>Not Applicable</th>
<th>Noted.</th>
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| 90740351 | Mr Steve Merry (received via email), Transport Policy and Development Manager, Suffolk County Council | - | - | - | Wangford The LHA considers that Mardle Road and unnamed road past Lime Kiln Farm to A1095 are unsuitable in their current form for use by HGV's or large plant and that the primary site access should remain via U1628 Hill Road (paragraph 14.4). | Noted. |

| 90766527 | Miss Charlie Christensen, Planning Advisor, Environment Agency | Yes | Yes | Yes | We welcome the inclusion in the Policy that the potential for impacts on the Groundwater Source Protection Zone (SPZ) in section d. However, we feel this paragraph should be clearer as the SPZ is currently listed under nature conservation which is misleading. We would like to see section d. reworded to 'the potential for direct and indirect impacts upon the Groundwater Source Protection Zone and nature conservation interest including…’ Paragraph 14.23 also states that Wangford is in a Groundwater SPZ. However, this is under the ‘Floods’ heading. We are supportive of the reference to these constraints, however the issues of flooding and the location within a SPZ should be separated out. We would like to see either two separate headings, or a single heading named ‘Flooding and Groundwater’. Although we note that restoration is not proposed, this Policy could be enhanced by including reference here that non-hazardous and inert landfill will need to be assessed with reference to our Groundwater Protection | The reference to floods indicates that the comments came from the SCC floods team. The policy states that proposals will need "measures to prevent significant adverse impacts to potable water resources...". “The local water environment” is also stated in the general environmental criteria policy (Policy GP4), which means the SPZ will need to be taken into account in any proposal, including proposals for the restoration phase. It is noted that The Environment Agency would likely object in principal to non-hazardous and inert landfill. |

Suffolk County Council
documents, particularly Position Statement E1 that addresses location. As the site is located in a SPZ1, we would likely object in principle at this site.

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<th>90772535</th>
<th>Mr Mike Jones (received via email), Conservation Officer, RSPB</th>
<th>No</th>
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|          | The strategic planning requirements set out in NPPF paragraphs 109, 114 and 117 (see our comments on the Vision, Aims and Objectives) and the requirement of policy MP6, which states that ‘preference will be given to restoration proposals that incorporate a net gain for biodiversity’ and ‘providing links to surrounding habitats is also encouraged’, indicate that it is appropriate for the plan to include strategic guidance on the most appropriate restoration proposals. We would also recommend that in the course of revising the HRA for this plan, that revisions to site policies giving guidance to the most suitable forms of biodiversity restoration are an acceptable means of ensuring that the plan is effective and that sites can deliver any restoration proposals required under HRA.

   At this stage, we have not been provided with any ecological information specific to the site of the proposed quarry extension, and therefore cannot comment on details of how wildlife currently using the site itself could be affected. Therefore, if proposals for this site are progressed and more information becomes available, we may need to comment further. However, we are concerned that the proposed quarry extension is less than 350m from the nationally and internationally protected wildlife sites, the Minsmere-Walberswick Special Protection Area (SPA), Ramsar site and Site of Special Scientific Interest (SSSI). It is also close to Suffolk Wildlife Trust’s Hen Reedbeds reserve. Given the proximity of the proposed quarry extension to designated sites, Habitats Regulations Assessment of the possible impacts of the proposals on these sites will be required.

   At present, the strategic-level HRA does not provide confidence that impacts can be avoided (see our comments above). The requirement for project-level HRA should also be recognised in the site specific policy. Particular consideration should be given to |

SCC considers that it is appropriate to determine the restoration of sites at the planning application stage, however advice from RSPB is helpful and noted. SCC has carried out an appropriate assessment and has undertaken focussed consultation.
potential hydrological impacts, disturbance from quarry operations and vehicle movements, and deposition of dust. Should adverse impacts be likely, the site can only be considered suitable if robust measures to avoid or mitigate impacts can be proposed. This site is being proposed by CEMEX UK. The RSPB and CEMEX UK have a long standing national partnership, working together to help restore and manage sites for priority habitats and species. If proposals at this site can be progressed without negative impacts on important wildlife sites, we would be keen to work with CEMEX UK to create a restoration plan which would provide high quality wildlife habitat following the working of the site.

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<td>Beverley McClean</td>
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<td>(received via email), AONB</td>
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<td>Planning Officer, AONB Team</td>
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**Site MS7 Wangford**

The proposed Minerals extension site at Lime Kiln Farm, Wangford lies wholly within the Suffolk Coast & Heaths AONB.

The area proposed for allocation has been reduced which is welcomed, however the proposed extension site still covers an area of 23.8ha which is considered to represent AONB Partnerships response Submission SMWLP Page 12 major development within the AONB. Major development within the AONB, is likely to have a long term adverse impact on the purposes of designation.

The inclusion of the site has been justified in terms of the unusually high gravel content (60%), the lack of alternative sites in north East Suffolk, the high grade quality of the gravel being extracted, the lack of economically viable alternative sources of gravel and the fact that impacts on the AONB, residential amenity, nearby ecological designations and recreation could all be mitigated.

Paragraph 116 of the NPPF states that "Planning permission should be refused for major developments in designated areas except in exceptional circumstances and where it can be demonstrated that they are in the public interest. Consideration of such applications should include an assessment of:

As stated in the plan SCC considers there are exceptional circumstances consistent with paragraph 116 for the following reasons: i) the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy; ii) there is a shortage of gravel in the market area served by this quarry and the proposed extension contains an unusually high percentage of gravel (60%) compared to most other quarries in Suffolk and Norfolk; iii) the market area includes both Ipswich and Norwich and the gravel from Wangford is used to supplement the sand rich deposits from other quarries within the market area including those of rival companies; iv) processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds; v) there are no other acceptable proposed sites within the north-east area of Suffolk; vi) alternative sources such as crushed rock, recycled aggregates and marine dredged sand and gravel are unable to provide a suitable alternative due to availability or economic viability; vii) it is considered that in respect of the impact upon the wider AONB, the recreation within the area, the nearby residential properties and ecological designations, the proposals could be mitigated to an acceptable extent.

This is the outline of SCCs reasoning with the details presented in Site Selections reports; the geology section of each report summarises the quality and
• The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

• The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and

• Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that can be moderated."

Taking each of the above considerations in turn with specific reference to Wangford Quarry:

From the evidence submitted the Partnerships would query whether this is sufficient to support the claim that the extension site is of national significance or of particular note for the local economy.

The Plan clearly identifies sites which would yield in excess of the required quantities needed to satisfy NPPF requirements and to meet local demand for minerals. The Partnerships therefore believe that there is no need to include the site at Lime Kiln Farm as demand can be met by working other sites outside of the designated area and by sourcing minerals from alternative sources e.g. marine aggregates.

The site is within an important area for the local tourism economy. The Plan appears to have failed to consider impacts on the tourism economy and the extent to which these effects can be avoided or moderated.

There is a significant risk of causing detrimental effects on the environment given the plethora of designated sites within less than 1km and the fact that the site is within a nationally designated AONB landscape. As already discussed these have not been fully assessed to date. The risk associated with the allocation of sites prior to fully understanding all likely significant impacts is too great.

quantity of sand and gravel at each site and the appendices present the geological data. No other sites submitted to SCC during the call for sites, contained material of a high percentage of gravel as Wangford Quarry.

Alternative sources such as recycled aggregate, crushed rock, and marine dredged aggregates are considered in sections 4, 5, and 6, of the Local Aggregate Assessment 2018, respectively. While it is the case that aggregate recycling from construction, demolition and excavation waste increased, supplies of this aggregate from this source are difficult to predict as they are tied to construction, demolition and excavation activities. While approximately 9 million tonnes of aggregate are licenced off the coast of East Anglia, relatively small tonnages are landed in Suffolk, with most of the material being landed in London, so this cannot be relied upon to supply Suffolk's needs, as the market determines where this material is landed.

For these reasons SCC considers these exceptional circumstances consistent with paragraph 116 of the NPPF. Crushed rock Suffolk does receive importation of crushed rock, however SCC would argue that having a local supply is more sustainable.

While it is acknowledged that there may be limited impacts on specific tourism receptors near to the site, however as the quarry is an extension to a currently existing quarry and the level of activity is not expected to significantly change from the current levels. As a result the overall impact of the quarry extension is not expected to be significantly different to the current situation.

While the plan does include an excess of the requirements in the NPPF, but the NPPF also requires SCC as the minerals planning authority considers "other factors", which includes mineral quality.

SCC considers that an outline Landscape and Visual Assessment is detailed enough for the plan stage of the planning process, however a detailed Landscape
The Outline Landscape and Visual Assessment (LVIA) Report Reference: CE-LY1271-RP01a – FINAL, submitted as part of the evidence base, assessed the AONB Partnerships response Submission SMWLP Page 13 potential landscape and visual impacts of the proposed quarry extension on the AONB, including impacts on tranquility.

The Outline LVIA stated that while mineral development might preferentially be steered away from intrinsically valued environmentally designated areas, temporary mineral development could be considered acceptable, once proportionate impact assessments have been undertaken and a suitable design, responding to the findings of the impact assessments devised.

The LVIA concluded that the allocation of the Lime Kiln extension would not result in landscape or visual constraints or effects that would be difficult to overcome or mitigate. It acknowledged that it would result in a small number of adverse potential landscape and visual effects that would need to be addressed as part of the detailed design stage to ensure that the potential development would be acceptable. It stated that mitigation and enhancement measures could easily be employed as part of detailed design stage.

The LVIA concluded that potential adverse effects on the ‘scenic beauty’ and ‘natural beauty’ within the AONB would be very limited and the potential for long-term enhancement, through implementation of a suitable restoration scheme was good, such that compliance with national and local policies would be readily achievable. Overall it concluded that inclusion of the Site as a mineral allocation in the adopted minerals and waste local plan was considered appropriate in relation to landscape and visual considerations.

The Partnerships consider that as the LVIA is so high level, that all likely significant impacts have not been assessed thoroughly enough at this time to justify the inclusion of the Lime Kiln Farm extension in the SMWLP.

It is acknowledged that there will be limited disruption to the AONB and the loss of tranquility, however this will be temporary and restoration of the site would restore it to a use with biodiversity gains or return the site to agriculture. It is also acknowledged that there would likely be permanent change to the landform, however this must be weighed against the benefits of the scheme, which is provision of high quality aggregates at a regional level from a more sustainable and reliable source than the alternatives. It should be noted that policy MS7 part “f” does require the retention of linear features such as hedgerows and trees on field boundaries.

Regarding the Sustainability Appraisal, policy MS7 does identify that there is potential negative impacts to groundwater, which have implications for nature conservation interests in the area. Part “e” of the policy is intended to address this.

Regarding the HRA, SCC have undertaken an appropriate assessment and undertaken an additional focussed consultation.
We consider that the allocation of the Lime Kiln Farm site is likely to result in the following permanent adverse long-term impacts on the purposes of the designation:

- sterilisation of this part of the AONB for approximately 13 years during the operational stage
- loss of tranquillity from increased noise, and traffic movements
- detrimental and permanent change to the landform/landscape character
- detrimental change in quality of experience in terms of recreational use
- potential water pollution, particularly in the receiving water bodies feeding into the Minsmere- Walberswick SPA

Whilst we acknowledge that good quality restoration and mitigation could deliver biodiversity gains, the restoration proposed in the Outline LVIA will result in the alteration of land form and gradients (1:4 and 1:8) which would permanently change the character of this part of the AONB. The Outline LVIA suggested that the landscape in this part of the AONB was already blighted due to current and previous quarrying related uses. The Partnerships do not consider that this justifies permitting more inappropriate development within this nationally landscape which could cause further harm.

Even if a case were to be successfully made to demonstrate that it is in the national interest to work minerals at Lime Kiln Farm, we maintain that substantial harm to the AONB would result. Any scheme on this site would need to successfully minimise harm to the AONB in terms of landscape character and detrimental impacts on tranquillity. In practical terms, this could only be addressed through retention of the characteristic features of the site, such as hedgerow boundaries and screening of the operational areas of the site during...
extraction. We fail to see how an appropriate landscape screening scheme could be successfully established within a reasonable timeframe to be effective in minimising harm to the AONB. The LVIA proposed the use of 2-3 m high bunding to provide screening and noise mitigation during the operation stage. Bunds are incongruous features within this landscape and are not considered suitable for use at this site particularly as part of site restoration. Following operation, restoration of the site to pre-extraction landform would be required to minimise the residual harm to the AONB. Anything other than restoration to the pre-extraction land levels would result in a permanent change to the landscape character of the AONB. The restoration approach seen elsewhere in the AONB, namely at Wangford Common Covert, would be wholly unacceptable at Lime Kiln Farm, given the exposed nature of the location.

For the reasons stated above, the Partnerships consider that the proposal to allocate the Lime Kiln site therefore fails to conserve and enhance the natural beauty and special qualities of this nationally designated landscape and is therefore inappropriate development within the AONB. As such the inclusion of the Lime Kiln Farm site in the Plan fails to address the requirements of paragraphs 115, 143 and 144 of the NPPF.

**Comments on the Sustainability Appraisal (SA) assessment for Wangford MS7**

Site MS7 at Wangford scored + (positive) when assessed against the Landscape / townscape SA objective. We do not think this accurately reflects the permanent landscape/landform changes that will occur if the Lime Kiln Farm site is approved for allocation.

The SA identified negative or possible negative impacts on surrounding groundwater, landscape, Minsmere-Walberswick SPA, Minsmere-Walberswick Heath & Marshes SSSI, Wangford Marshes CWS, Suffolk Coast NNR, Hen Reedbeds (SWT Site), Reydon Wood (SWT Site), protected species, archaeology, and the proximity of a number of residential properties. It concluded that
policy would address the majority of these impacts suitably, with additional information and mitigation measures requested of any forthcoming planning applications. In recognition of the comments raised in the previous consultation and the potential impacts highlighted for the site on Natura 2000 sites, the SA recommended the addition of further detail to the Policy regarding the specific assessment requirements of work related to ‘nature conservation interest’; for instance whether there is a need for a project-level HRA to be undertaken to accompany any forthcoming planning application.

This has not been incorporated into policy MS7.

Section 14.14 highlights the need for impacts on nature conservation interests including Minsmere- Walberswick to be adequately assessed and where necessary AONB Partnerships response Submission SMWLP Page 15 mitigation identified but makes no mention of the need for site specific Habitats Regulations Assessment.

**Proposed modification to policy MS7**

The Partnerships request the removal of the proposed mineral site extension at Lime Kiln Farm from the Submission SMWLP as it is located within Suffolk Coast & Heaths AONB. The site also falls within the Zone of Influence of the Minsmere - Walberswick SPA. Adequate assessments (HRA and LVIA) have not been completed to date and we do not consider that the inclusion of the site has been adequately justified by robust evidence.

**General comments on the Habitats Regulations Assessment (HRA)**

HRA is an iterative process which should have been ongoing throughout the process of preparing the Suffolk Minerals & Waste Plan from Issues and Options stage through to Preferred Options stage and Submission stage.
A high-level Habitats Regulation Assessment Screening Report was completed in 2017, which mainly concluded a neutral effect on all European sites and recommended the preparation of project level HRAs, at the planning application stage, for all of the proposed allocated sites located close to European designated areas. The Partnerships consider that the policies and proposals in the SMWLP with the potential to impact on European designated sites i.e. Special Areas of Conservation, Special Protection Areas and Ramsar sites have not been properly assessed.

We consider that a full Appropriate Assessment (AA) needs to be completed to ensure that all the likely significant effects and the impact on the integrity of the European Designated sites (Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites, arising from proposed policies, and the proposed allocation of sites in the SMWLP are properly assessed and understood. Without the completion of a full AA, it is impossible for the Minerals Authority to confidently conclude that all of the sites proposed for allocation are acceptable in environmental terms particularly with regards SPAs, SACs and Ramsar sites. Without this assessment it considered premature to allocate those sites located close to internationally designated sites.

The Partnerships understand that further work is to be undertaken on the Habitats Regulations Assessment in response to comments received at the Pre-Submission consultation stage and in light of the recent Sweetman Ruling. The revised Habitats Regulations Assessment /Appropriate Assessment was not available for comment during the SMWLP Submission consultation. As published, therefore the 2017 HRA Scoping Report, submitted as part of the SMWLP evidence base, does not satisfy the requirements of EU legislation.

We will be happy to review the amended HRA/AA Report once it has been revised and review our comments if necessary.
The AONB Officers do not wish to participate in person at the Examination in Public (EIP) for the Submission SMWLP.

We would like to be notified about future consultations related to the SMWLP, the date of the EIP and be notified when the Inspector’s Examination Report is published.

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<th>87800180</th>
<th>Dr Martin Nicholls</th>
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The plan contravenes the NPPF, which states "When determining planning applications local authorities should as far as practical provide for mineral extraction from outside of AONBs.

The plan should abide by the NPPF. Quote "When determining planning applications local authorities should as far as practical provide for minerals from outside of AONBs. Unquote.

The National Planning Policy Framework paragraph 116 states that planning permission for major development (which includes sand and gravel extraction) within an AONB should be refused except in exceptional circumstances where it can be demonstrated that it is in the Public Interest. It states that such proposals should be considered in the light of an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way;
- and any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

NPPF paragraph 144 states that when determining planning applications local authorities should as far as practicable provide for minerals from outside of AONBs.

Having appraised the proposed site within the context of the NPPF and other material considerations it was considered justified to include the Lime Kiln Farm within the Plan because of the following exceptional reasons:

the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy;

there is a shortage of gravel in the market area served by this quarry and the proposed extension contains an...
unusually high percentage of gravel compared to most other quarries; the market area includes both Ipswich and Norwich and the gravel from Wangford is used to supplement the sand rich deposits from other quarries within the market area; processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds; there are no other acceptable proposed sites within the north-east area of Suffolk; alternative sources such as crushed rock, recycled aggregates and marine dredged sand and gravel are unable to provide a suitable alternative due to availability or economic viability; it is considered that in the impact upon the wider AONB, recreation within the area, and the nearby residential properties and ecological designations could be moderated to an acceptable extent.

Detailed evidence showing exceptional circumstances can be found in the Local Aggregates Assessment and in the Site Selection Reports, which detail the quantity and quality of reserves through detailed geological reports.

87983106  Professor Hugh Williamson  -  No  -  The presentation in Wangford yesterday was helpful. Nevertheless I continue to hold the view that this one site should be excluded from future consideration on the ground that it is the only one which is in an AONB with great wild life sensitivity. The arguments in its favour are all based on the commercial benefits to the present owner and I am not clear that these should be allowed to override the wider question of the accepted need to preserve an area which has been designated as so environmentally significant.

As explained above, I think this site should not be developed further.

The National Planning Policy Framework paragraph 116 states that planning permission for major development (which includes sand and gravel extraction) within an AONB should be refused except in exceptional circumstances where it can be demonstrated that it is in the Public Interest. It states that such proposals should be considered in the light of an assessment of:

the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and any detrimental effect on the environment, the landscape and recreational opportunities, and the
NPPF paragraph 144 states that when determining planning applications local authorities should as far as practicable provide for minerals from outside of AONBs.

Having appraised the proposed site within the context of the NPPF and other material considerations it was considered justified to include the Lime Kiln Farm within the Plan because of the following exceptional reasons:

the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy;

there is a shortage of gravel in the market area served by this quarry and the proposed extension contains an unusually high percentage of gravel compared to most other quarries;

the market area includes both Ipswich and Norwich and the gravel from Wangford is used to supplement the sand rich deposits from other quarries within the market area;

processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds;

there are no other acceptable proposed sites within the north-east area of Suffolk;

alternative sources such as crushed rock, recycled aggregates and marine dredged sand and gravel are unable to provide a suitable alternative due to availability or economic viability;

it is considered that in the impact upon the wider AONB, recreation within the area, and the nearby residential properties and ecological designations could be moderated to an acceptable extent.

Detailed evidence showing exceptional circumstances can be found in the Local Aggregates Assessment and in the Site Selection Reports, which detail the quantity and quality of reserves through detailed geological reports.
Any planning application on this site will require a detailed assessment of the potential impacts to the landscape and ecology, including to designations such as Area of Outstanding Natural Beauty. These assessment would be required to address the impacts on wildlife and ecology. It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

A restoration scheme and mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations, must be submitted as part of the planning application for the site.

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<td>89421851</td>
<td>Helen Atkinson Wood (Received via post)</td>
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|          |      | Not for the first time, I am writing to add my opposition to Lime Kiln gravel pit proposal. It is not hard to imagine during the world cup tournament a site approximately the size of 36 football pitches; and the irreparable damage it would incur to the landscape and wildlife in this site inside the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, were it to be permitted. I implore you to reject this plan. I implore you to reject this plan.

8943192 Mr & Mrs Richard & Margaret Sax | No | No | No |
| The Inspectors report of 1997 was ignored and no record of why can be found by the Council. The Report categorically ruled out the possibility of exceptional circumstances that might overturn AONB protections arising in any plan (cf a planning application). No copy of any legal advice taken by SCC can be found. SCC’s decision to include Lime Kiln in the plan is flawed and not legal. The process has been conducted inadequately and unfairly. Cemex statements have been repeated verbatim without any challenge although on the face of it they are variously subjective and inconsistent and there is no recognition that they are put forward for further their commercial interests and profit. There is no mention at all of the content of the opposing reasons given by local SCC do consider the circumstances exceptional as per the criteria of paragraph 116 of the NPPF, due to the quality of the material. Typical deposits across Suffolk are sandy and the Wangford site has a high level of gravel, which is used to supplement the material from other quarries. Detailed evidence showing exceptional circumstances, can be found in the Local Aggregates Assessment and in the Site Selection Reports, which detail the quantity and quality of material in all sites submitted to SCC, through detailed geological reports. It is considered that the landscape (including the AONB) and wildlife considerations can be addressed.
and other objectors. There is insufficient data to satisfy the rigorous criteria for an AONB override or consideration of the importance to Suffolk and the national interests in preserving the environment and red list endangered birds for the future generations. Suffolk is a wonderful tourist attraction bringing many visitors to admire its beauty and wildlife. It has been clearly stated that the damage caused by the quarrying remove the extension of the Wangford quarry into Lime Kiln Fields in Reydon parish from the SCC Minerals plan.

however Policy MS4 is requiring detailed assessments of these issues to be submitted with a planning application.

90179550 Mr Nat le Roux Yes No Yes The arguments for approving the Wangford Quarry extension advanced in para 14.9 are not sufficiently strong to override the policies in NPPF paras 115 and 116 Approval for Wangford Quarry extension should be withdrawn

Exceptional circumstances are outlined in the plan in paragraph 14.9, but the detailed information is within the plan evidence base. Each Site Selection Report contains a "Geology" section summarises the quality and quantity of the sand and gravel resources in each site, with detailed geological reports presented the appendices. Site selection reports show that no other acceptable sites containing the high percentage of gravel that is present at Wangford were submitted at the call for sites. Alternative sources such as recycled aggregate and marine dredged aggregates are considered in sections 4 and 6 of the Local Aggregate Assessment 2018, respectively. While it is the case that aggregate recycling from construction, demolition and excavation waste increased supplies of this aggregate from this source are difficult to predict as they are tied to construction, demolition and excavation activities. While approximately 9 million tonnes of aggregate are licenced off the coast of East Anglia, relatively small tonnages are landed in Suffolk, with most of the material being landed in London. For these reasons SCC considers these exceptional circumstances consistent with paragraph 116 of the NPPF. It is noted that these issues were not raised by Natural England during the Preferred Options plan consultation.

90283621 Mrs Caroline Wilson - No - I object now, as I did before, to the inclusion of the Wangford Lime Kiln in the plan and I do not feel my objections have been answered

Exceptional circumstances are outlined in the plan in paragraph 14.9, but the detailed information is within the plan evidence base. Each Site Selection Report contains a "Geology" section summarises the quality
Dear Sirs,

I am writing in support of the planning application by CEMEX for a new extension to Wangford Quarry, Lime Kiln Farm, Wangford. We have been collecting from the quarry since the late 70s when it was owned by Atlas Aggregates. We rely heavily on products from the quarry in our business which is primarily supplying soil & sand based products to the golfing & sports industry plus supplies to distributors & the general public online. If CEMEX are unable to extend the quarrying at Wangford it will lead to increased prices to ourselves as we would have to source the products elsewhere. We

Mr Adrian Bailey (received via post), N/A, Bailey’s of Norfolk LTD

90293190

Mr Adrian Bailey

Noted.
would then have to pass these increased prices onto our customers. In our purpose built laboratory we test soil & sand products and are keen to continue using the mineral supply from Wangford quarry as we find that it meets our needs for the sports industry.

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<td>the impact on peacefulness, the environment and the wildlife has not been taken into consideration adequately</td>
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<td>90461683</td>
<td>Mrs Amy Wren</td>
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|          | I strongly object to the inclusion of Wangford Lime Kiln in the Plan and challenge the soundness of the SCC Plan with regard to Wangford Lime Kiln. Although I am not resident in the area of Wangford, I have regularly visited the area since childhood. I am also deeply concerned about protecting Areas of Outstanding National Beauty for future generations. Major development within an AONB should be refused except in exceptional circumstances where it can be demonstrated that it is in the Public Interest. The Council has not discharged its obligations to demonstrate this and so the high bar required to demonstrate exceptional circumstances has not been reached. Accordingly, and for the reasons set out below, planning permission should be refused. Commercial and convenience reasons are not sufficient to destroy irrevocably such important landscape. I objected to this development at the pre-consultation stage as being inappropriate in the AONB, and do not consider that SCC responded adequately to our concerns, merely repeating their earlier case for overriding AONB protections. I do not believe that proposed mitigation, which will permanently change the landscape forms, can adequately compensate for the loss of the Area of Outstanding Natural Beauty in this location, nor that the impact on nature, landscape, tranquillity and the local economy (which depends largely on tourism) have been properly taken into account by Suffolk County Council. Significant details remain to be clarified so it is premature to conclude that SCC do consider the circumstances exceptional, due to the quality of the sand and gravel reserves. Typical deposits across Suffolk are sandy and the Wangford site has a high level of gravel, which is used to supplement the material from other quarries. This material can also be used to produce gravel for more specialist uses. SCC has considered alternative sources, such as recycled aggregate and marine dredged aggregate, however there is not certainty that there would be adequate supply from these sources: recycled aggregate is dependent on material from construction and demolition waste, which can not be guaranteed; and while large quantities of marine dredged aggregate are licenced off the coast of East Anglia, relatively small quantities of this are landed in Suffolk and where this material is landed is determined by the market.

Detailed evidence showing exceptional circumstances can be found in the Local Aggregates Assessment and in the Site Selection Reports, which detail the quantity and quality of material in all sites submitted to SCC, through detailed geological reports.

It is considered that the landscape (including the AONB) and wildlife considerations can be addressed, however Policy MS4 is requiring detailed assessments of these issues to be submitted with a planning application.
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<td>90513012</td>
<td>Dr Caroline Hyde (received via email)</td>
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Please see attached document, prepared on behalf of my neighbours at 2 Cave Cottages, Helen & Michael Hall. This incorporates the issues I wish to submit in my representation, in addition to the following.

We understand it is likely that mineral deposits equivalent to those of site MS7 are likely to be available elsewhere locally, if this is the case it clearly negates the grounds on which the council seeks to override the restriction on development within an AONB as set down by the NPPF.

We object, on behalf of Mr and Mrs Hall, to policy MS7: Wangford, in respect of a proposed extension to Wangford quarry for gravel extraction.

SCC do consider the circumstances exceptional, due to the quality of the sand and gravel reserves. Typical deposits across Suffolk are sandy and the Wangford site has a high level of gravel, which is used to supplement the material from other quarries. This material can also be used to produce gravel for more specialist uses. SCC has considered alternative sources, such as recycled aggregate and marine dredged aggregate, however there is not certainty that there would be adequate supply from these sources: recycled aggregate is dependent on material from construction and demolition waste, which can not be guaranteed; and while large quantities of marine dredged aggregate are licenced off the coast of East Anglia, relatively small quantities of this are landed in Suffolk and where this material is landed is determined by the market.
Mr and Mrs Hall are the owner-occupiers of No. 2 Cave Cottages which is one of a pair of cottage which lies immediately to the south of the A1095 Halesworth Road and so is in close proximity to the proposed quarry extension.

As set out on the plan associated with policy MS7 entitled “Wangford Quarry”, the proposed extension is one for three county-related interventions in this local area taking into account the existing quarry to the east, the landfill site and the proposed extension which these representations concern.

It is accepted that minerals are finite and "they are where they are" but their quarrying still needs to be compliant with current planning policy or the plan would not be sound or legally compliant. There are clear and direct planning issues in respect of a range of relevant matters which can result from an inappropriate allocation and undermine the soundness of the plan and these arise in this case.

We note that any quarrying of the site would need to adhere to the policy criteria as set out in draft policy MS7 (a-h) however any allocation sets a development plan presumption and it is fair and appropriate to have some regards to these matters at representation stage.

The site and general area are the subject of a number of layers of sensitivity.

The first, albeit not in a particular order, is the AONB designation which covers the broad area.

Paragraphs 111 and 116 of the NPPF are very clear that planning permission for major developments (and there is no doubt that any application for the quarry extension would be so defined and it would comprise EIA development) should be refused unless in exceptional circumstances. This therefore sets a very high test in respect of this allocation.

In addition the site is in close proximity to the wetland habitat to include the hen reed bed SWT site which is

Detailed evidence showing exceptional circumstances can be found in the Local Aggregates Assessment and in the Site Selection Reports, which detail the quantity and quality of material in all sites submitted to SCC, through detailed geological reports. These show that no other sites containing material of equivalent quality were submitted to SCC.

It is considered that the landscape (including the AONB) and wildlife considerations can be addressed, however Policy MS4 is requiring detailed assessments of these issues to be submitted with a planning application.
rich in wildlife and appropriately designated. The NPPF as one would expect is equally protective of the natural and local environment and this is a fundamental component of the Framework as articulated from paragraphs 109–125 in the interest of sustainable development. There are also a number of European directives which need to be taken into account.

In addition, the tourism context of Southwold is also a further layer of sensitivity.

Southwold is well-known as a honeypot location and the tourism industry provides jobs for a significant number of people. It is also a year-round tourist attraction albeit with an inevitable focus during the summer months. The economic dimension to sustainable development is a matter to which a great deal of weight can be attributed when considering this allocation. It is noted that the same is said of the existing quarrying at 14.9 (i) of the Plan but clearly there is a direct conflict between the two.

We briefly run through the MS7 criteria reiterating that we accept that this is not an application but a submission draft policy allocation but nonetheless this is still a useful exercise. The consideration of the relevant matters that policy MS7 presents is an appropriate forum for questioning the allocation in the plan.

Criterion (a) deals with the amenity implication of HGVs. This is relevant in terms of the cited residential properties, not only Cave Cottage but those which are cited in the introductory text to the policy. We note that we are also dealing with cumulative impacts with the ongoing quarrying and landfill site. This is relevant also in terms of the tourism dimension as the Halesworth Road is an important route into Southwold and one which a number of tourists travel along.

A road whose character is unduly influenced by HGV movements is not encouraging of the tourism industry.
In respect of criterion (b) we would of course anticipate a mitigation of landscape and visual impact through a scheme of planting and bunding, however, the quarrying will take place over a number of years and this will have a long-term impact upon the character and appearance of the AONB. We note that the existing quarry has a great deal of impact in any event and obvious mitigation is not apparent.

In respect of criterion (c) archaeological evaluation should be pre-designation noting the Development Plan status associated with the adoption of policy MS7.

Criterion (d) is particularly pertinent as it sets out an extensive list of very sensitive designations. It is difficult to conceive of a more sensitive site and this is very clearly reflected in the policy which does seem to undermine the appropriateness of this designation.

In respect of (e) we note that the site, as also reflected in criterion (d), is a groundwater source protection zone and consequently there are potential implications arising from this development which would not occur elsewhere.

In respect of criteria (f), (g) and (h) we note that these are standard matters which we would expect attached to any application for planning permission.

In short the site is a particularly sensitive one and this is reflected in the policy.

Whilst acknowledging the gravel which can be extracted from the site, we are not clear that the evidence base conclusively demonstrates that this is the only site and that there are no other sites that meet policy requirements where the layer of sensitive of this magnitude does not exist.

For these reasons policy MS7 is not seen as being sound. There is no clear indication as to why a less sensitive location could not be chosen and one cannot readily see how a scheme could meet all of the criteria as set out in the draft policy.
Continuance of this designation could undermine the overall plan for these reasons.

Take site MS7 from the Plan

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<th>90636349</th>
<th>Ms Charlotte Ducann (received via post)</th>
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<td>The plan is unsound for the following reasons: The degradation of AONB site. Designation of an iconic landscape and valuable farmland. Destruction of tranquillity, beauty &amp; character of area &amp; industrialisation of rural area. No environmental considerations of wildlife and plant life, especially red listed curlews or oaks or independent survey. Not in public interest whatsoever enough gravel at Henham &amp; other sources. There are no modifications possible to make this local plan sound: It should not be allowed to proceed especially in a time of ecological collapse &amp; food insecurity. Local considerations of land is more important than the financial interests of a multi national cooperation.</td>
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Suffolk County Council
spherical gravel grade product which can be used for specialist uses such as filter beds; there are no other acceptable proposed sites within the north-east area of Suffolk; alternative sources such as crushed rock, recycled aggregates and marine dredged sand and gravel are unable to provide a suitable alternative due to availability or economic viability; it is considered that in the impact upon the wider AONB, recreation within the area, and the nearby residential properties and ecological designations could be moderated to an acceptable extent.

A restoration scheme and mitigation that satisfies the County Council, based on appropriate surveys and taking account of statutory and non-statutory designations, must be submitted as part of the planning application for the site.

Site phasing should minimise the impact of the operations on ecology and landscape, by ensuring only part of the site is extracted at one time. Possible conditions on planning permission (if granted) are to restore the site to a suitable condition that it can be used by stone curlew, or only extracting outside of the stone curlew nesting season. Site phasing, which means that only a smaller section of the site is worked at a time, before being restored, will also help to minimise the impact on stone curlew as well as other wildlife and the landscape.

It is expected that features such as hedgerows and mature oak trees will be retained due to their biodiversity and landscape value.

At this stage it is not expected that the development would be detrimental to the hen reed beds, due to the distance of them from the site, however this will be determined at the planning application stage.

90642036 Col. R K Chater MBE - - - I strongly object to the inclusion of the Lime Kiln site within the above plan. This area is within an AONB and should be protected. SCC do consider the circumstances exceptional, due to the quality of the sand and gravel reserves. Typical deposits across Suffolk are sandy and the Wangford
The Wangford quarry has been present since 1950, since when has it has excavated large areas of the locality; the Wangford Covert and more recently the area west of Mardle Road. Both designated AONB's. The National Policy Planning Framework seeks to protect AONB's and provides suitable guidance for planners. I do not consider these conditions have been met with regards to the site. Moreover, there are multiple sites in the surrounding area which again conflicts with government guidance. It is my belief that there are adequate suppliers of aggregates in the area and that the closure of Wangford quarry would have no deleterious effect upon the supply of aggregates.

The local economy of largely dependent upon tourism; holiday cottages, B&B's, & self catering being through which most local employment is derived. Any further excavation in the area, particularly near the wildlife reserve of the Wanford Hen Reedbeds would have a negative effect on tourism and therefore the local economy through expenditure and associated employment.

| 90731146 | Dr & Mrs FD & SJ Campbell (received via email) | Please follow link: https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/Individual-Reps/C/Campbell-90731146.pdf | SCC considers there are exceptional circumstances consistent with paragraph 116 for the following reasons: i) the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy; ii) there is a shortage of gravel in the market area served by this quarry and the proposed extension contains an unusually high percentage of gravel (60%) compared to most other quarries in Suffolk and Norfolk; iii) the market area includes both Ipswich and Norwich and the gravel from Wangford is used to supplement the sand rich deposits from other quarries within the market area including those of rival companies; iv) processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds; v) there are no other acceptable proposed sites within the north-east area of Suffolk; vi) alternative sources such as crushed rock, recycled aggregates and marine dredged sand and gravel are unable to provide a suitable alternative due to availability or economic |
viability; vii) it is considered that in respect of the impact upon the wider AONB, the recreation within the area, the nearby residential properties and ecological designations, the proposals could be mitigated to an acceptable extent.

This is the outline of SCCs reasoning with the details presented in Site Selections reports; the geology section of each report summarises the quality and quantity of sand and gravel at each site and the appendices present the geological data. No other sites submitted to SCC during the call for sites, contained material of a high a percentage of gravel as Wangford Quarry.

Alternative sources such as recycled aggregate, crushed rock, and marine dredged aggregates are considered in sections 4, 5, and 6, of the Local Aggregate Assessment 2018, respectively. While it is the case that aggregate recycling from construction, demolition and excavation waste increased, supplies of this aggregate from this source are difficult to predict as they are tied to construction, demolition and excavation activities. While approximately 9 million tonnes of aggregate are licenced off the coast of East Anglia, relatively small tonnages are landed in Suffolk, with most of the material being landed in London, so this cannot be relied upon to supply Suffolks needs, as the market determines where this material is landed. For these reasons SCC considers these exceptional circumstances consistent with paragraph 116 of the NPPF. Suffolk does receive importation of crushed rock, however SCC would argue that having a local supply of aggregates is more sustainable.

While it is acknowledged that there may be limited impacts on specific tourism receptors near to the site, however as the quarry is an extension to a currently existing quarry and the level of activity is not expected to significantly change from the current levels. As a result the overall impact of the quarry extension is not expected to be significantly different to the current situation.
While the plan does include an excess of the requirements in the NPPF, but the NPPF also requires SCC as the minerals planning authority considers “other factors”, which includes mineral quality.

SCC considers that an outline Landscape and Visual Assessment is detailed enough for the plan stage of the planning process, however a detailed Landscape and Visual Assessment has been undertaken since the consultation.

It is acknowledged that there will be limited disruption to the AONB and the loss of tranquility, however this will be temporary and restoration of the site would restore it to a use with biodiversity gains or return the site to agriculture. It is also acknowledged that there would likely be permanent change to the landform, however this must be weighed against the benefits of the scheme, which is provision of high quality aggregates at a regional level from a more sustainable and reliable source than the alternatives. It should be noted that policy MS7 part "f" does require the retention of linear features such as hedgerows and trees on field boundaries.

SCC have undertaken an appropriate assessment and this concludes that the Suffolk Minerals and Waste Local Plan will have no adverse affect upon the integrity of any European site. This applies to the Local Plan acting alone or in combination with any other plan or project. This coupled with the proposed restoration indicates that a net gain for biodiversity is likely.

The extract from the 1997 extract from the officer’s report is noted. However, two further extensions to the quarry have been permitted since that date.

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<th>90735177</th>
<th>Cllr Philip O’Hear (received via)</th>
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Cllr Philip O’Hear (received via)

Reydon Parish Council opposes this development as we believe it is contrary to Clause 115 of the National Planning Policy Framework (NPPF). It would result in

SCC considers there are exceptional circumstances consistent with paragraph 116 for the following reasons: i) the existing quarry at Wangford has been in
unacceptable damage to Suffolk Coast and Heaths area of Outstanding Natural Beauty (AONB). We strongly support the detailed arguments supported by extensive evidence in the submission made by our residents Aileen and William Irving. Here we wish to reiterate the key points of our opposition.

1. Suffolk County Council (SCC) has failed to meet the tests required for an exception to the rules preventing industrial development in the AONB as set out in the National Planning Policy Framework (NPPF Clause 116).

2. We accept that there is a national need for mineral and that mineral in this site is of good quality. However we do not agree that either SCC or Cemex in their submission have proved that the extension of Wangford Quarry into Lime Kiln Farm in Reydon is necessary to meet forecast local or regional need.

3. SCC’s Final Draft Plan would provide a 31% surplus of aggregate reserves over forecast demand. As forecast output from Wangford is 8% of total demand, Wangford could be excluded from the Plan while still maintaining a 23% surplus of reserves over forecast demand.

4. Alternative supplies of equivalent coarse aggregate to that occurring in Wangford Quarry could be produced from certain local quarries, marine dredging and/or imported crushed rock, including:
   a. Local quarries, such as Henham (where greater reserves remain than previously identified) and various nearby quarries in Norfolk, for example at Kirby Cane and Earsham
   b. Greater uptake than at present of available marine dredged aggregate landed at Ipswich, Lowestoft and/or Great Yarmouth, especially as proposed by Brett Aggregates at the Western Dock in Ipswich and another operator at Great Yarmouth.
   c. General increased output from other land quarries, and possibly from increased quantities of imported crushed rock.

This is the outline of SCCs reasoning with the details presented in Site Selections reports; the geology section of each report summarises the quality and quantity of sand and gravel at each site and the appendices present the geological data. No other sites submitted to SCC during the call for sites, contained material of a high a percentage of gravel as Wangford Quarry.

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5. The Landscape Character Assessment (LCA) prepared as part of the submission by the Irvings shows that the area of the proposed development is a significant landscape. This makes it an important part of the AONB which should be given the full protection. Protection of the countryside surrounding the settlement of Reydon was a very high priority in our Community Plan (Reydon Village Plan, 2014) and is a consistently strong feature of our current consultation for our emerging Neighbourhood Plan. Indeed, connecting Reydon Wood and the Hen Reedbeds by means of a footpath between the current Wangford Quarry and the proposed extension at Lime Kiln Farm is a well-supported priority as part of a strategy to connect our residents better with the outstanding countryside around them.

6. The proposed development would result in unacceptable and irreparable harm to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), both during excavation and afterwards. The proposed mitigation measures are completely inadequate. These conclusions, extremely well-evidenced in the submission by the Irvings, demonstrate that the Landscape and Visual Appraisal prepared by Crestwood Environmental for Cemex is deeply flawed.

7. The proposed development will bring limited benefit to the local economy and its overall impact is very likely be negative since much of the prosperity of the area is derived from tourism, particularly wildlife and countryside tourism.

8. In the consultation on SCC’s First Draft Plan, there was widespread opposition to the extension of Wangford Quarry into Reydon from some 150 individuals, Reydon and Wangford Parish Councils, District and County Councillors, Therese Coffey MP and Suffolk Coast and Heaths AONB. The proposal has not materially changed since then, so the opposition continues.
1. This proposal and the related Policy MS7 should be deleted from the SCC’s Mineral and Waste Plan. There can be no doubt that the demand could be supplied from other sources if Wangford Quarry. For this principal reason and those related points made above, we consider that there is no case made for the exception to the rules protecting the AONB to allow this development.

2. Deleting this proposal and Policy MS7 would make the Local Plan legally compliant and sound.

SCC have undertaken an appropriate assessment and this concludes that the Suffolk Minerals and Waste Local Plan will have no adverse affect upon the integrity of any European site. This applies to the Local Plan acting alone or in combination with any other plan or project. This coupled with the proposed restoration indicates that a net gain for biodiversity is likely.

90736187 Mr Philip O’Hear (received via email), Secretary, Southwold and Reydon Society

No No - The Southwold and Reydon Society, representing some 360 residents of our community, opposes this development as we believe it is contrary to Clause 115 of the National Planning Policy Framework (NPPF). It would result in unacceptable damage to Suffolk Coast and Heaths area of Outstanding Natural Beauty (AONB). We strongly support the detailed arguments supported by extensive evidence in the submission made by local residents Aileen and William Irving. Here we wish to reiterate the key points of our opposition.

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5. The Landscape Character Assessment (LCA) prepared as part of the submission by the Irvings shows that the area of the proposed development is a significant landscape. This makes it an important part of the AONB which should be given the full protection.

6. The proposed development would result in unacceptable and irreparable harm to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), both during excavation and afterwards. The proposed mitigation measures are completely inadequate. These conclusions, extremely well-evidenced in the submission by the Irvings, demonstrate that the Landscape and Visual Appraisal prepared by Crestwood Environmental for Cemex is deeply flawed.

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1. This proposal and the related Policy MS7 should be deleted from the SCC’s Mineral and Waste Plan. There can be no doubt that the demand could be supplied from other sources if Wangford Quarry. For this principal reason and those related points made above, we consider that there is no case made for the exception to the rules protecting the AONB to allow this development.

2. Deleting this proposal and Policy MS7 would make the Local Plan legally compliant and sound.

It is acknowledged that there will be limited disruption to the AONB and the loss of tranquility, however this will be temporary and restoration of the site would restore it to a use with biodiversity gains or return the site to agriculture. It is also acknowledged that there would likely be permanent change to the landform, however this must be weighed against the benefits of the scheme, which is provision of high quality aggregates at a regional level from a more sustainable and reliable source than the alternatives. It should be noted that policy MS7 part "f" does require the retention of linear features such as hedgerows and trees on field boundaries.

SCC have undertaken an appropriate assessment and this concludes that the Suffolk Minerals and Waste Local Plan will have no adverse affect upon the integrity of any European site. This applies to the Local Plan acting alone or in combination with any other plan or project. This coupled with the proposed restoration indicates that a net gain for biodiversity is likely.

90745446 Mr Sam Hubbard (received via email), Principle Planner, Waveney District Council - No -

The Suffolk Coast and Heaths Area of Outstanding Natural Beauty is an important resource to East Suffolk. Not only does it provide valuable natural habitats it also provides a destination for recreation which helps support the local tourism economy which is vital to East Suffolk. The Council understands and support the sustainable extraction of minerals to support economic growth and development. However, the Council considers that the expansion of quarrying in the Area of Outstanding Natural Beauty should be an absolute last resort.

Chapter 11 of the National Planning Policy Framework (NPPF) places a high level of protection to land designated as Area of Outstanding Natural Beauty. Specifically, paragraph 115 states that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty. Paragraph 116 goes on to state that planning permission should be refused for major developments in these

SCC do consider the circumstances exceptional as set out paragraph 116 of the Plan, due to the quality of the sand and gravel reserves etc. The quality of the reserves on each site submitted to the County Council are within the Geology section of Site Selection Reports, and detailed geological data can be found in appendices. Typical deposits across Suffolk are sandy and the Wangford site has a high level of gravel, which is used to supplement the material from other quarries. This material can also be used to produce gravel for more specialist uses. SCC has considered alternative sources, such as recycled aggregate and marine dredged aggregate, however there is no certainty that there would be adequate supply from these sources: recycled aggregate is dependent on material from construction and demolition waste, which can not be guaranteed; and while large quantities of marine dredged aggregate are licenced off the coast of East Anglia, relatively small quantities of this are landed in
designated areas unless it can be demonstrated the proposal is in the public interest having regard to:

- The need for the development
- The cost of and scope for developing elsewhere
- The extent to which the detrimental effect on the landscape and recreational opportunities can be moderated.

Paragraph 144 states that local planning authorities should ensure that as far as practical landbanks should be maintained from land outside of Areas of Outstanding Natural Beauty. The National Planning Practice Guidance (NPPG) on Minerals states that in exceptional circumstances, such as where a local authority area is largely made up of designated areas such as Areas of Outstanding Natural Beauty, it may be appropriate to rely largely on policies which set out the general conditions against which applications will be assessed rather than specific allocations. Waveney District Council is concerned that Policy MS7 is not in accordance with national planning policy and therefore the plan is currently unsound as result of the inclusion of the site. The Council considers that there is insufficient evidence to justify the allocation with respect to the need for the development and the consideration of alternative more suitable options.

Need for the Development

Given that the Suffolk Minerals and Waste Local Plan allocates 31% more land than is required, it is considered the need for this particular site is not justified and not in accordance with the NPPF or NPPG. The removal of the MS7 allocation would still result in a safety margin of 20%. It should be noted as a comparison the proposed submission draft of the Waveney Local Plan only over allocates housing development by 12%.

The Council understands that the Suffolk Minerals and Waste Local Plan does not prohibit additional quarries Suffolk and where this material is landed is determined by the market and so not in the control of the County Council.

The comment regarding if SCC investigated the geological content of quarries in norfolk is noted, however the plan states that Norfolk (or more specifically Norwich) is within the market area of this quarry and that also supplants Norfolk quarries. The deposits in Norfolk are quite similar in that they are generally quite sandy.

While other quarries may provide the quantity of sand and gravel required in the County this does not address the issue of the quality of the mineral resources (namely the gravel content), which makes this site important. While the potential for prior extraction on development sites is recognised, extraction can not be guaranteed due to other planning considerations (such as drainage), and many of these sites, such as those in the Submission Draft Waveney Local Plan, have not been tested for the quantity and quality of reserves, meaning they cannot be relied on as a source of aggregates in the Minerals and Waste Local Plan.

The existing highways access is long established and therefore there was no need to model it as it is an existing situation.

An assessment of heritage assets was carried out as part of the site selection process (see site selection report) and it is considered that no historic buildings would be affected.
on unallocated land. Indeed, the extensive area covered by the Minerals Consultation Area could lead to prior extraction from a number of large strategic housing developments across the County. These developments further will lessen the need for this quarry.

It is understood that this particular quarry proposal contains a high proportion of gravel unlike most quarries in Norfolk and Suffolk. However, it is not clear what evidence supports this statement. For example what analysis has been done on the gravel content of nearby quarries in Norfolk? Linked to the point below has any testing been done of other potential sites within the extensive Minerals Consultation Area?

Alternative Sites

Whilst it is appreciated a number of alternative options have been considered in the Sustainability Appraisal which were based on site submission by quarry operators. It is not clear from the evidence or the plan whether the planning authority pro-actively investigated other options within the Minerals Consultation Area or adjacent to other existing quarries which hadn’t been submitted. It is also not apparent the extent to which the planning authority has engaged with Norfolk to see if there are any more appropriate options over the border to meet needs within the north east area of Suffolk.

Other Issues
Traffic

Traffic modelling undertaken as part of the Waveney Local Plan indicated possible capacity issues at the two main junctions on to the A12 in the vicinity of the quarry. It is questioned whether the Suffolk model has been used to consider the cumulative effects on traffic on these junctions.

Heritage Impact

The site is in close proximity to two grade II listed builds Reydon Grange, and Reydon Hall. The site could be
SMWLP Responses to Submission Draft Consultation March 2019

considered to be in the setting of these listed buildings. No Heritage Impact Assessment has been undertaken to assess the impact on the setting and the significance of the assets. In absence of this evidence it is questioned whether the site is in conformity with the heritage policies of the NPPF.

It is suggested that in order to make the plan sound further evidence is required to demonstrate the need for this allocation. Without this evidence the allocation should be removed from the plan. It is not considered that this change would undermine the supply of minerals given the over-supply identified. Following adoption of the plan and prior to a future review, the County Council should be encouraged to explore alternative options which could yield the same quality material. If on this review there are no alternative options and the level and type of aggregate is still required, the County Council could consider allocating this site in a future version of the plan.

SCC consider the circumstances exceptional, as is required in paragraph 116 of the NPPF, due to the quality of the sand and gravel reserves. Typical deposits across Suffolk are sandy and the Wangford site has a high level of gravel, which is used to supplement the material from other quarries. This material can also be used to produce gravel for more specialist uses. SCC has considered alternative sources, such as recycled aggregate and marine dredged aggregate, however there is not certainty that there would be adequate supply from these sources: recycled aggregate is dependent on material from construction and demolition waste, which can not be guaranteed; and while large quantities of marine dredged aggregate are licenced off the coast of East Anglia, relatively small quantities of this are landed in Suffolk and where this material is landed is determined by the market.

While there is overprovision of mineral within the plan (to provide flexibility in the supply of minerals) this does not address the issue of the quality of the mineral.
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<td>90608559</td>
<td>Mr &amp; Mrs Bill &amp; Aileen Irving (received via email)</td>
<td>See representation here: <a href="https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/Individual-Reps/I/Irving-BA-90608559.pdf">https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/Individual-Reps/I/Irving-BA-90608559.pdf</a></td>
<td>As stated in the plan SCC considers there are exceptional circumstances consistent with paragraph 116 for the following reasons: i) the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy; ii) there is a shortage of gravel in the market area served by this quarry and the proposed extension contains an unusually high percentage of gravel (60%) compared to most other quarries in Suffolk and Norfolk; iii) the market area includes both Ipswich and Norwich and the gravel from Wangford is used to supplement the sand rich deposits from other quarries within the market area including those of rival companies; iv) processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds; v) there are no other acceptable proposed sites within the north-east area of Suffolk; vi) alternative sources such as crushed rock, recycled aggregates and marine dredged sand and gravel are unable to provide a suitable alternative due to availability or economic viability; vii) it is considered that in respect of the impact upon the wider AONB, the recreation within the area, the nearby residential properties and ecological designations, the proposals could be mitigated to an acceptable extent. This is the outline of SCCs reasoning with the details and evidence presented in Site Selection reports; the geology section of each report summarises the quality and quantity of sand and gravel at each site and the appendices present the geological data. Reports for sites not included in the plan are included in the evidence base to demonstrate that SCC did consider other sites outside of the AONB. No other acceptable sites submitted to SCC during the call for sites contained material of a high a percentage of gravel as resources (namely the gravel content), which makes this site important. It is considered that the landscape (including the AONB) and wildlife considerations can be addressed, however Policy MS4 is requiring detailed assessments of these issues to be submitted with a planning application to ensure this is the case.</td>
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Lime Kiln Farm, particularly those bordering the site who understandably will be most affected. I do not deem this a necessary erosion of the AONB or other protected designations.
Wangford Quarry.

Alternative sources such as recycled aggregate, crushed rock, and marine dredged aggregates are considered in sections 4, 5, and 6, of the Local Aggregate Assessment 2018, respectively. While it is the case that aggregate recycling from construction, demolition and excavation waste increased, supplies of this aggregate from this source are difficult to predict as they are tied to construction, demolition and excavation activities. While approximately 9 million tonnes of aggregate are licenced off the coast of East Anglia, relatively small tonnages are landed in Suffolk, with most of the material being landed in London, so this cannot be relied upon to supply Suffolk's needs, as the market determines where this material is landed. Suffolk does receive importation of crushed rock, however SCC would argue that having a local supply is more sustainable. In the site selection process an extension to Henham quarry was considered and the reasons for excluding this site extension from the plan are set out in the site selection report for Henham. For these reasons SCC considers these exceptional circumstances consistent with paragraph 116 of the NPPF.

To require sand and gravel consumption to be reduced by better design is not within the scope of this plan, nor feasible for the plan to achieve. Additionally, recycling of waste materials is very high in the east of England, with the Suffolk Waste Survey noting a 91% recovery rate. This was taken into account in the Local Aggregate Assessment.

The plan does contain an over provision of aggregates. This enables the aggregate provision in the county to be flexible, as there is the possibility of allocated sites not coming forward within the plan period, or unidentified constraints may reduce available reserves when the most detailed level of assessment is undertaken at the planning application stage. Also, as outlined in the Local Aggregate Assessment 2018, the level of housing delivery in Suffolk is below what is
planned by approximately 35%. It is considered appropriate to have an additional quantity of sand and gravel allocated in case of increased housing delivery across the county, which would result in increased demand for aggregates. While it is the case that removing Wangford Quarry extension from the plan would still allow Suffolk to meet its aggregate need based on 10 years sales, other factors also need to be considered and removal of this site would reduce the availability of higher quality sand and gravel in the county.

To state that there are adequate reserves by other local operators is not the case. The local aggregates assessment outlines a 9 million tonne shortfall over the plan period in Suffolk, which is the basis for the allocations within the plan. While Suffolk could meet its required quantity of Sand and Gravel without the Wangford Site it is the quality of the reserves on this site which make it an important inclusion. It can be seen in the site selection reports that no other sites with reserves of this quality were put forward during the call for sites.

Regarding comment that quarries closer to Ipswich and Norwich should supply Ipswich and Norwich, there are already a number of quarries within the proximity of both. However, in the case of quarries near Ipswich, the gravel content of the quarries is significantly lower.

It is recognised in the plan that cumulative impacts could be an issue at quarry sites, with existing quarries and other types of development. Policy MP5 has been introduced in the plan, to address these issues.

It is correct that an Appropriate Assessment of sites that potentially have an effect on European designations. An appropriate assessment has been carried out and a focussed consultation on the Appropriate Assessment has taken place.

It is acknowledged that there will be limited disruption to the AONB and the loss of tranquillity, however this
will be temporary and restoration of the site would restore it to a use with biodiversity gains or return the site to agriculture. It is also acknowledged that there would likely be permanent change to the landform, however this must be weighed against the benefits of the scheme, which is provision of high quality aggregates at a regional level from a more sustainable and reliable source than the alternatives. It should be noted that policy MS7 part "f" does require the retention of linear features such as hedgerows and trees on field boundaries.

To prevent issues relating to mud on the road, planning conditions could be pit in place to require the use of a wheel wash on site.

While it is acknowledged that there may be impacts on specific tourism receptors near to the site, however as the quarry is an extension to a currently existing quarry and the level of activity is not expected to significantly change from the current levels. As a result, the overall impact of the quarry extension is not expected to be significantly different to the current situation.

Sand and gravel quarries do not necessarily result in the permanent loss of agricultural land, as the site can be restored to agricultural use following sand and gravel extraction.

It should be noted that SCC did consult Reydon Parish Council at the preferred options consultation. The Parish Council state that they received notice of the consultation on the 30th October in their representation to the preferred options consultation, which is when all consulted parish councils would have received notice of the consultation. Wangford was chosen as the location for the consultation event for this site because, although the extension is in Reydon parish, it is actually closer to the village of Wangford than the village of Reydon.

The suggested conclusion to add an area from the existing area of Henham Quarry is not appropriate and
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<td>90737901</td>
<td>Mr Simon Loftus OBE (received via email)</td>
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<td>See representation here: <a href="https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/Individual-Reps/L/Loftus-90737901.pdf">https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/Individual-Reps/L/Loftus-90737901.pdf</a></td>
<td>SCC has set out criteria against which a planning application at this site will be assessed in policy MS7. SCC does consider that there is an overriding need for sand and gravel extraction in this site due to the quality of the mineral. As stated in the plan SCC considers there are exceptional circumstances consistent with paragraph 116 for the following reasons: i) the existing quarry at Wangford has been in operation for several decades and is an important part of the local economy; ii) there is a shortage of gravel in the market area served by this quarry and the proposed extension contains an unusually high percentage of gravel (60%) compared to most other quarries in Suffolk and Norfolk; iii) the market area includes both Ipswich and Norwich and the gravel from Wangford is used to supplement the sand rich deposits from other quarries within the market area including those of rival companies; iv) processing is able to produce a regular spherical gravel grade product which can be used for specialist uses such as filter beds; v) there are no other acceptable proposed sites within the north-east area of Suffolk; vi) alternative sources such as crushed rock, recycled aggregates and marine dredged sand and gravel are unable to provide a suitable alternative due to availability or economic viability; vii) it is considered that in respect of the impact upon the wider AONB, the recreation within the area, the nearby residential properties and ecological designations, the proposals could be mitigated to an acceptable extent. This is the outline of SCCs reasoning with the details and evidence presented in Site Selection reports; the geology section of each report summarises the quality and quantity of sand and gravel at each site and the</td>
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appendices present the geological data. Reports for sites not included in the plan are included in the evidence base to demonstrate that SCC did consider other sites outside of the AONB. No other acceptable sites submitted to SCC during the call for sites, contained material of a high a percentage of gravel as Wangford Quarry.

High level assessments of impacts on health, the natural environment and general amenity. These assessments can be seen in site selection reports for each site in the plan. Policies GP4: General Environmental Criteria sets out criteria (which include health impacts from noise and dust pollution, biodiversity, and amenity) that planning applications should be assessed against. There are also site specific criteria to address issues specific to certain sites within the site policies, including Wangford. SCC has recognised the presence of an internationally designated wildlife site and has undertaken an appropriate assessment to identify the impacts, which has also been consulted on.

Policy MS7 has criteria that designed to minimise and mitigate the effects on conservation interests, including protected species, habitats and ecological networks. For example, the retention of features important to landscape and ecology, such as hedgerows and trees must be retained. A planning application must also contain a restoration plan, which takes into account the landscape. Policy MS7 part e requires that measures to prevent significant adverse hydrological impact with respect to both potable water supply, and protected sites and species.

Suffolk County Council Policy

SCC has allocated sites in line with its aims and objectives in the plan. The site selection reports detail all the sites submitted to SCC and reasons for their inclusion in or exclusion from the plan. These reasons do include impact on ecology and landscape. It is acknowledged that there are potential impacts on the
landscape and nature conservation, and SCC has responded to these potential impacts by including policies within the plan which state that any planning application on the site must adequately address these issues, which is in line with the aims and objectives within the plan.

It should be noted that SCC did consult Reydon Parish Council at the preferred options consultation. The Parish Council state that they received notice of the consultation on the 30th October in their representation to the preferred options consultation, which is when all consulted parish councils would have received notice of the consultation. Wangford was chosen as the location for the consultation event for this site because, although the extension is in Reydon parish, it is actually closer to the village of Wangford than the village of Reydon. SCC acknowledges that the site is within the parish of Reydon, however the site is an extension to Wangford Quarry, which is why it was labelled as such in the plan.

The plan does contain an over provision of aggregates. This enables the aggregate provision in the county to be flexible, as there is the possibility of allocated sites not coming forward within the plan period, or unidentified constraints may reduce available reserves when the most detailed level of assessment is undertaken at the planning application stage. Also, as outlined in the Local Aggregate Assessment 2018, the level of housing delivery in Suffolk is below what is planned by approximately 35%. It is considered appropriate to have an additional quantity of sand and gravel allocated in case of increased housing delivery across the county, which would result in increased demand for aggregates. While it is the case that removing Wangford Quarry extension from the plan would still allow Suffolk to meet its aggregate need based on 10 years sales, other factors also need to be considered and removal of this site would reduce the availability of higher quality sand and gravel in the county. As stated above it is considered there is a need for this site due to the quality of the mineral.
| 90771970 | Joanne Beales (received via email) | - | - | Proposed extensions to Henham Quarry were submitted during the call for sites and considered for inclusion in the plan. The reasons for not including the site in the plan are presented in the site selection report for Henham. |

I am the Sales Representative at Cemex and I cover the East. Wangford quarry is one of CEMEX’s quarries that I look after. I would like to write to you to tell you why we need the Lime Kiln Farm extension at Wangford Quarry. Firstly, this quarry will be the main hub in East Anglia — Flixton Park Quarry will be coming to the end of its life in the next 5 or 6 years, so we need some substantial reserves in the area to reach out to all the demand inland, and the surrounding areas.

The cost implications of hauling material in for builders and contractors in the area will have huge impact, especially for the small independent local builder. It will simply make the cost of material too high for them to tender and to stay competitive within the market area. At Wangford we are lucky enough to offer indigenous material to our customers which is all ISO 14001 & ISO 9001 accredited. Our material is of high spec and the construction industry recognises this. We have customers in the Midlands leading all the way down to the south. We are graded for the use of Utilities as our stone does not conduct heat as easily as a lower grade stone. The prevents electric cables from overheating which in could be serious issue.

Wangford quarry has been supplying high quality aggregates for decades. We have customers who have been with us for over 70 years. Within the years I’ve worked here we have sold and supported our local builders and contractors in Reydon, Southwold, Wrentham, Halesworth, Kessingland, and Lowestoft. If we can no longer meet local demand for development in the future, then aggregates will simply have to be hauled in to the area from further afield. There will be more emissions, more road traffic, more congestion, and less efficiency in meeting local demand and as already mentioned the financial implications this will have of the costs of materials. |

Noted.
On a personal level, I have worked here for 16mths and my father had his 50th year anniversary a few years ago at Cemex. He is still working and is the quarry manager for Flixton and Wangford, his entire life has been dedicated to quarrying and land restoration, making some fantastic nature reserves and protecting wildlife. I have grown up with some of the employees and I can’t imagine how difficult it would be to find employment elsewhere in the same industry doing what they do. When you have worked for the same company for as long as they have it really is home from home. It appears that once you work in quarrying it’s a job for life!! CEMEX is a family brand name for employees and customers. We are all very proud of what we have achieved and continue to do so. I have a 16yr old son, who hopefully can follow in Grandads footsteps, introducing youngsters to the quarrying industry is difficult and hopefully promoting Lime Kiln Farm has raised awareness in the area and put a very positive spin on what we do. My partner Darren works for Pirtek and CEMEX is one of his customers, this would also reduce his work significantly. This would mean that our household income would be affected as both our wages are targeted related pay. By losing Wangford, Darren and I both lose and would really have to think about our future and supporting our child through college.

90515234  Mr Michael Hall (received via email)  No  No  -  We object, on behalf of Mr and Mrs Hall, to policy MS7: Wangford, in respect of a proposed extension to Wangford quarry for gravel extraction. Mr and Mrs Hall are the owner-occupiers of No. 2 Cave Cottages which is one of a pair of cottage which lies immediately to the south of the A1095 Halesworth Road and so is in close proximity to the proposed quarry extension. As set out on the plan associated with policy MS7 entitled “Wangford Quarry”, the proposed extension is one for three county-related interventions in this local area taking into account the existing quarry to the east, the landfill site and the proposed extension which these representations concern. It is accepted that minerals are finite and “they are where they are” but their quarrying still needs to be SCC do consider the circumstances exceptional, due to the quality of the sand and gravel reserves. Typical deposits across Suffolk are sandy and the Wangford site has a high level of gravel, which is used to supplement the material from other quarries. This material can also be used to produce gravel for more specialist uses. SCC has considered alternative sources, such as recycled aggregate and marine dredged aggregate, however there is not certainty that there would be adequate supply from these sources: recycled aggregate is dependent on material from construction and demolition waste, which can not be guaranteed; and while large quantities of marine dredged aggregate are licenced off the coast of East Anglia, relatively small quantities of this are landed in Suffolk and where this material is landed is determined
compliant with current planning policy or the plan would not be sound or legally compliant. There are clear and direct planning issues in respect of a range of relevant matters which can result from an inappropriate allocation and undermine the soundness of the plan and these arise in this case. We note that any quarrying of the site would need to adhere to the policy criteria as set out in draft policy MS7 (a-h) however any allocation sets a development plan presumption and it is fair and appropriate to have some regards to these matters at representation stage. The site and general area are the subject of a number of layers of sensitivity. The first, albeit not in a particular order, is the AONB designation which covers the broad area. Paragraphs 111 and 116 of the NPPF are very clear that planning permission for major developments (and there is no doubt that any application for the quarry extension would be so defined and it would comprise EIA development) should be refused unless in exceptional circumstances. This therefore sets a very high test in respect of this allocation. In addition the site is in close proximity to the wetland habitat to include the hen reed bed SWT site which is rich in wildlife and appropriately designated. The NPPF as one would expect is equally protective of the natural and local environment and this is a fundamental component of the Framework as articulated from paragraphs 109-125 in the interest of sustainable development. There are also a number of European directives which need to be taken into account. In addition, the tourism context of Southwold is also a further layer of sensitivity. Southwold is well-known as a honeypot location and the tourism industry provides jobs for a significant number of people. It is also a year-round tourist attraction albeit with an inevitable focus during the summer months. The economic dimension to sustainable development is a matter to which a great deal of weight can be attributed when considering this allocation. It is noted that the same is said of the existing quarrying at 14.9 (i) of the Plan but clearly there is a direct conflict between the two.

by the market.

It is considered that the landscape (including the AONB) and wildlife considerations can be addressed, however Policy MS4 is requiring detailed assessments of these issues to be submitted with a planning application.
We briefly run through the MS7 criteria reiterating that we accept that this is not an application but a submission draft policy allocation but nonetheless this is still a useful exercise.

The consideration of the relevant matters that policy MS7 presents is an appropriate forum for questioning the allocation in the plan.

Criterion (a) deals with the amenity implication of HGVs. This is relevant in terms of the cited residential properties, not only Cave Cottage but those which are cited in the introductory text to the policy. We note that we are also dealing with cumulative impacts with the ongoing quarrying and landfill site. This is relevant also in terms of the tourism dimension as the Halesworth Road is an important route into Southwold and one which a number of tourists travel along.

A road whose character is unduly influenced by HGV movements is not encouraging of the tourism industry. In respect of criterion (b) we would of course anticipate a mitigation of landscape and visual impact through a scheme of planting and bunding, however, the quarrying will take place over a number of years and this will have a long-term impact upon the character and appearance of the AONB. We note that the existing quarry has a great deal of impact in any event and obvious mitigation is not apparent.

In respect of criterion (c) archaeological evaluation should be pre-designation noting the Development Plan status associated with the adoption of policy MS7.

Criterion (d) is particularly pertinent as it sets out an extensive list of very sensitive designations. It is difficult to conceive of a more sensitive site and this is very clearly reflected in the policy which does seem to undermine the appropriateness of this designation.

In respect of (e) we note that the site, as also reflected in criterion (d), is a groundwater source protection zone and consequently there are potential implications arising from this development which would not occur elsewhere.

In respect of criteria (f), (g) and (h) we note that these are standard matters which we would expect attached to any application for planning permission.

In short the site is a particularly sensitive one and this is reflected in the policy. Whilst acknowledging the gravel...
which can be extracted from the site, we are not clear that the evidence base conclusively demonstrates that this is the only site and that there are no other sites that meet policy requirements where the layer of sensitive of this magnitude does not exist. For these reasons policy MS7 is not seen as being sound. There is no clear indication as to why a less sensitive location could not be chosen and one cannot readily see how a scheme could meet all of the criteria as set out in the draft policy. Continuance of this designation could undermine the overall plan for these reasons.

| 90515556 | Mrs Helen Hall (received via post) | No | No | We object, on behalf of Mr and Mrs Hall, to policy MS7: Wangford, in respect of a proposed extension to Wangford quarry for gravel extraction. Mr and Mrs Hall are the owner-occupiers of No. 2 Cave Cottages which is one of a pair of cottage which lies immediately to the south of the A1095 Halesworth Road and so is in close proximity to the proposed quarry extension. As set out on the plan associated with policy MS7 entitled "Wangford Quarry", the proposed extension is one for three county-related interventions in this local area taking into account the existing quarry to the east, the landfill site and the proposed extension which these representations concern. It is accepted that minerals are finite and "they are where they are" but their quarrying still needs to be compliant with current planning policy or the plan would not be sound or legally compliant. There are clear and direct planning issues in respect of a range of relevant matters which can result from an inappropriate allocation and undermine the soundness of the plan and these arise in this case. We note that any quarrying of the site would need to adhere to the policy criteria as set out in draft policy MS7 (a-h) however any allocation sets a development plan presumption and it is fair and appropriate to have some regards to these matters at representation stage. The site and general area are the subject of a number of layers of sensitivity. The first, albeit not in a particular order, is the AONB designation which covers the broad area. SCC do consider the circumstances exceptional, due to the quality of the sand and gravel reserves. Typical deposits across Suffolk are sandy and the Wangford site has a high level of gravel, which is used to supplement the material from other quarries. This material can also be used to produce gravel for more specialist uses. SCC has considered alternative sources, such as recycled aggregate and marine dredged aggregate, however there is not certainty that there would be adequate supply from these sources: recycled aggregate is dependent on material from construction and demolition waste, which can not be guaranteed; and while large quantities of marine dredged aggregate are licenced off the coast of East Anglia, relatively small quantities of this are landed in Suffolk and where this material is landed is determined by the market.

It is considered that the landscape (including the AONB) and wildlife considerations can be addressed, however Policy MS4 is requiring detailed assessments of these issues to be submitted with a planning application. |
Paragraphs 111 and 116 of the NPPF are very clear that planning permission for major developments (and there is no doubt that any application for the quarry extension would be so defined and it would comprise EIA development) should be refused unless in exceptional circumstances. This therefore sets a very high test in respect of this allocation.

In addition the site is in close proximity to the wetland habitat to include the hen reed bed SWT site which is rich in wildlife and appropriately designated. The NPPF as one would expect is equally protective of the natural and local environment and this is a fundamental component of the Framework as articulated from paragraphs 109-125 in the interest of sustainable development. There are also a number of European directives which need to be taken into account.

In addition, the tourism context of Southwold is also a further layer of sensitivity.

Southwold is well-known as a honeypot location and the tourism industry provides jobs for a significant number of people. It is also a year-round tourist attraction albeit with an inevitable focus during the summer months. The economic dimension to sustainable development is a matter to which a great deal of weight can be attributed when considering this allocation. It is noted that the same is said of the existing quarrying at 14.9 (i) of the Plan but clearly there is a direct conflict between the two.

We briefly run through the MS7 criteria reiterating that we accept that this is not an application but a submission draft policy allocation but nonetheless this is still a useful exercise.

The consideration of the relevant matters that policy MS7 presents is an appropriate forum for questioning the allocation in the plan.

Criterion (a) deals with the amenity implication of HGVs. This is relevant in terms of the cited residential properties, not only Cave Cottage but those which are cited in the introductory text to the policy. We note that we are also dealing with cumulative impacts with the ongoing quarrying and landfill site. This is relevant also in terms of the tourism dimension as the Halesworth...
Road is an important route into Southwold and one which a number of tourists travel along. A road whose character is unduly influenced by HGV movements is not encouraging of the tourism industry. In respect of criterion (b) we would of course anticipate a mitigation of landscape and visual impact through a scheme of planting and bunding, however, the quarrying will take place over a number of years and this will have a long-term impact upon the character and appearance of the AONB. We note that the existing quarry has a great deal of impact in any event and obvious mitigation is not apparent.

In respect of criterion (c) archaeological evaluation should be pre-designation noting the Development Plan status associated with the adoption of policy MS7. Criterion (d) is particularly pertinent as it sets out an extensive list of very sensitive designations. It is difficult to conceive of a more sensitive site and this is very clearly reflected in the policy which does seem to undermine the appropriateness of this designation.

In respect of (e) we note that the site, as also reflected in criterion (d), is a groundwater source protection zone and consequently there are potential implications arising from this development which would not occur elsewhere. In respect of criteria (f), (g) and (h) we note that these are standard matters which we would expect attached to any application for planning permission.

In short the site is a particularly sensitive one and this is reflected in the policy. Whilst acknowledging the gravel which can be extracted from the site, we are not clear that the evidence base conclusively demonstrates that this is the only site and that there are no other sites that meet policy requirements where the layer of sensitive of this magnitude does not exist.

For these reasons policy MS7 is not seen as being sound. There is no clear indication as to why a less sensitive location could not be chosen and one cannot readily see how a scheme could meet all of the criteria as set out in the draft policy. Continuance of this designation could undermine the overall plan for these reasons.
| 9052229 | Bethany Philbedge (received via email), Planning Officer, Suffolk Preservation Society | - | - | - | MS7: Wangford, Archaeology

Following our comment highlighting the inconsistent approach to archaeology between the sites at Wherstead and at Wangford which are considered to have similar potential, the Responses to the Preferred Options Consultation document (March 2018) stated that changes would be made to ensure consistency between these sites. However MS9: Wherstead and MS7: Wangford continue to set out different approaches; schemes of archaeological investigation being required pre-application for the Wangford site but secured via planning condition for the Wherstead site.

MS7: Wangford and MS6: Tattingstone, Designated AONB Landscapes

- The MS7: Wangford site is within the Suffolk Coast and Heaths AONB and, if it is assessed that an overriding need for the development exists, appropriate mitigation must be provided to minimise harm to the AONB in terms of landscape character and detrimental impacts on tranquility. The retention of hedgerow boundaries and further planting to screen the operational areas of the site will be required and we note the proposed the use of bunds. The use of bunds to restore the landscape however will be inappropriate as they are an alien feature within this sensitive landscape.

|  |  |  |  |  | The appropriate approach to archaeology is advised by SCC Archaeology.

Bunding is a temporary feature designed to store soils and overburden during extraction and are usually dismantled when sites are restored.
### 16. WETHERDEN

#### Policy MS8

<table>
<thead>
<tr>
<th>Reference Number</th>
<th>Respondent</th>
<th>Legally compliant?</th>
<th>Sound?</th>
<th>Compliance with duty to co-operate?</th>
<th>Representation</th>
<th>SCC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>90609211</td>
<td>Mr Jonathan Worsley (received via email), Consultant, PDE Consulting</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>We write in support of the inclusion of an extension to Lawn Farm Quarry within the Local Plan pre-submission draft. We do note, however, that the proposed extraction area on page 86 of the pre-submission draft and on policy Map MS5 differs from the area that was submitted in the original submission dated 02 February 2017. The west of the site has been pinched in, and the north of the site has been extended. We request that this be amended. For your ease I have attached the original site location plan, M16.135.D.047, and a more detailed site specific drawing, M16.135.D.048, to this representation form. See attachment here: <a href="https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/Individual-Reps/P/PDE-Consulting-90609211.pdf">https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/Individual-Reps/P/PDE-Consulting-90609211.pdf</a></td>
<td>Support for the site is noted, however it is also noted that the site area was not highlighted as an issue at the Preferred Options Consultation. <strong>Small correction to site area required.</strong></td>
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<tr>
<td>90740351</td>
<td>Mr Steve Merry (received via email), Transport Policy and Development Manager, Suffolk County Council</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Wetherden The LHA considers that in Paragraph 15.8 HGV a management plan is required to avoid HGV traffic deviating into nearby villages</td>
<td>Add an additional clause to Policy MS8 Wetherden: “j) a traffic management plan drafted to avoid traffic routeing through local villages including Elmswell and Whetherden except in the case of local deliveries.”</td>
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<td>ID</td>
<td>Name</td>
<td>Agreement</td>
<td>Comment</td>
<td>Response</td>
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<tr>
<td>90766674</td>
<td>Miss Charlie Christensen, Planning Advisor, Environment Agency</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Paragraph 15.25 states that Wetherden is in a Groundwater SPZ. However, this is under the ‘Floods’ heading. We are supportive of the reference to these constraints, however the issues of flooding and the location within a SPZ should be separated out. We would like to see either two separate headings, or a single heading named ‘Floods and Groundwater’. Floods reflects that the comments are a consultation response from the SCC floods team.</td>
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<tr>
<td>90772535</td>
<td>Mr Mike Jones (received via email), Conservation Officer, RSPB</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>The strategic planning requirements set out in NPPF paragraphs 109, 114 and 117 (see our comments on the Vision, Aims and Objectives) and the requirement of policy MP6, which states that ‘preference will be given to restoration proposals that incorporate a net gain for biodiversity’ and ‘providing links to surrounding habitats is also encouraged’, indicate that it is appropriate for the plan to include strategic guidance on the most appropriate restoration proposals. SCC considers that it is appropriate to determine the restoration of sites at the planning application stage, however advice from RSPB is helpful and noted. SCC has carried out an appropriate assessment and has undertaken focused consultation.</td>
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<tr>
<td>89634238</td>
<td>Lt Col (Retd) George Stanford</td>
<td>-</td>
<td>-</td>
<td>Why bother. Even if we all object it will still go ahead</td>
<td>Noted.</td>
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<td>88027943</td>
<td>Mrs Jane Wooster</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>My concern is how close the local quarry is being allowed to come to housing in Elmswell. It is the only site that affects multiple houses. All the other sites affect between 1 and 3 dwellings. Also, I understand from a report I read that if all the sites continue producing gravel at the current rate production will be 37.2% over budget, so does this intrusive site really need to continue in operation? This site does not stick within the framework it should do. It operates on Sundays (when it shouldn't). It is very noisy - I do not want to listen to the thump of the machinery in my back garden - I prefer birdsong. I also do not like having to do my washing again due to the dust generated drifting over my garden.</td>
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<td>88391595</td>
<td>Mr Michael Friend</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>The current operator has shown complete disregard to the rules and limitation, often working at weekend, the dust is not controlled. Further with major new housing just 50m from the boundary it poses a health, noise and safety hazard - They currently have 30+m deep holes adjacent to public footpaths, All the other extraction site are well away from residential premises. The authority has no staff, no hours, no money to enforce current restrictions complaint are filed away. This site has continually failed to comply with road clearing, noise, weekend working and dust - they ALWAYS say the will 'buy new kit' inform the staff and other fob offs. This site and the operator are not fit for purpose</td>
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<td>The plan does contain a 31% oversupply within the plan period. This is in order to provide flexibility in the supply of aggregates, in the case that sites do not come forward, and due to the potential for increased housing delivery across Suffolk. Mitigation measures should be possible to protect the amenity of nearby residents. Full assessment of the impact, which will determine what measures are required to bring these impacts to an acceptable level. These assessments will need to take into account the permitted housing and an appropriate standoff between the area of extraction and the permitted housing. The extension can only be granted planning permission once it has been demonstrated that appropriate mitigation measures can be implemented.</td>
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<td>Future planning applications on this site will be an opportunity to improve planning conditions and address some of the issues raised by residents, including amenity issues, use of the on site wheel wash to address the mud on the road issue, and working hours.</td>
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<tr>
<td>Reference</td>
<td>Name and Contact Details</td>
<td>Position and Comments</td>
<td>Mitigation Measures</td>
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<td>88392453</td>
<td>Mr Peter Dow, Clerk to Elmswell Parish Council</td>
<td>Yes</td>
<td>The proximity of the proposed expansion to the new housing at Wetherden Road (ref. MSDC Application ref 4911/16) renders the proposal unsustainable when measured against Local Plan and Core Strategy policies seeking to protect neighbourhood amenity. The catalogue of problems resulting from the current operations suggest that bringing the industrial operation so close to the built environment of Elmswell will be unworkable and seriously to the detriment of the amenity of the new houses. Further, NPPF paragraph 75 looks to protect and enhance public rights of way, such as the ancient path of Sandy Lane (Elmswell FP 22) which will be lost under this proposal. The proposal for the extension of Lawn Farm Quarry should not be taken forward. Mitigation measures should be possible to protect the amenity of nearby residents. Full assessment of the impact, which will determine what measures are required to bring these impacts to an acceptable level. These assessments will need to take into account the permitted housing and an appropriate standoff between the area of extraction and the permitted housing. The extension can only be granted planning permission once it has been demonstrated that appropriate mitigation measures can be implemented. Future planning applications on this site will be an opportunity to improve planning conditions and address some of the issues raised by residents.</td>
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<p>| 89019083 | Mr Michael Moore (Received by post) | No | Proposed Development The road access will mean increased lorry movement both to and from the existing and proposed extension will bring a significant amount of movement to Haughley New Street and other minor roads which Aggmax use despite requests to the contrary, to use the recommended route. Geology The grading analysis does not show the site containing scrap material e.g. Scrapped Vehicles and such deposits as the site was previously used as a waste disposal. Development Plan and Planning Applications There has been a proposal, agreed, for the construction of up to 150 (?) properties on the edge of this proposal on the north edge. This proposal would have a serious effect on the development and sale of the property. Highways The current operation on Lawn Farm has no effective wheel wash on site. It has been in excess of 2 years that repeated request for this to be put in place. Despite promises by Aggmax this has NEVER been undertaken and completed. Proposed Development This is a proposed continuation rather than an increase in the level of operations. Geology SCC have made inquiries but the promoter insists that this is outside of the proposed extension area. Development Plan and Planning Applications Mitigation measures should be possible to protect the amenity of nearby residents. Full assessment of the impact, which will determine what measures are required to bring these impacts to an acceptable level. These assessments will need to take into account the permitted housing and an appropriate standoff between the area of extraction and the permitted housing. The extension can only be granted planning permission once it has been demonstrated that appropriate mitigation measures can be implemented. Highways Mud on the road is monitored on a regular basis. Landscaping There are views into the existing site from the north. |</p>
<table>
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<tr>
<th>Responses to Submission Draft Consultation</th>
<th>March 2019</th>
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| Suffolk County Council | Page 238 |

He seems to have been powerless. The lack of an effective wheel wash has a major effect on the roadway particularly in wet weather.

**Landscapes**

Landscape to the existing site has not been effective from a position along the top ridge, the proposed extension. Promises were made to screen part of the site looking towards Warren Lane.

**Buildings**

Whilst there are no historic buildings within the proposal. There are 2 Oak trees that are the subject of tree preservation orders along the track between the proposal and existing site.

**Archaeology**

There has been no visual presence of any undertaking of an investigation exercise of this proposal. Whereas with the current operation investigation was visible but on the site south of this proposal.

Modifications would include removing the application in its entirety.

- Enhanced screening will be required for the proposed extension.

Archaeology

SCC has identified archaeological potential within the extension site. Archaeological assessment will be secured by planning condition. Assessment will identify remains and any necessary mitigation strategy.

<table>
<thead>
<tr>
<th>89021645</th>
<th>Mr &amp; Mrs Carol &amp; Peter Trickey (received by post)</th>
<th>No</th>
<th>No</th>
<th>No</th>
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<tr>
<td>The proposed extension of the Lawn Farm Quarry is too close to existing properties and would be too close to the 147 new properties to be built next to Mill Gardens. We already suffer from noise and dust continually from the existing work carried out at the quarry, and to have the work so much closer to new homes would be unbearable. The company do not comply with the agreed working hours now. So should not be allowed to carry on extending the quarry.</td>
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<td>Having viewed the other sites under consideration at the meeting on 15-6-18 at Elmswell. The site at Wetherden appears to be closest to dwellings than any of the other applications and that's before the new 147 properties built. The quality of life of the residents must surely be taken into consideration on selecting the site chosen. Let us hope so.</td>
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<tr>
<td>Mitigation measures should be possible to protect the amenity of nearby residents. Full assessment of the impact, which will determine what measures are required to bring these impacts to an acceptable level. These assessments will need to take into account the permitted housing and an appropriate standoff between the area of extraction and the permitted housing. The extension can only be granted planning permission once it has been demonstrated that appropriate mitigation measures can be implemented.</td>
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<td>Future planning applications on this site will be an opportunity to improve planning conditions and address some of the issues raised by residents.</td>
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</table>
89804426  Mr Lewis Elmes  Yes  No  Yes  My concerns include issues with noise, dust and access from the extended quarry towards Elmswell. Consideration must also be given to the removal of the ancient Sandy Lane path, which is used regularly by the community. In addition, the quarry extension would immediately border the new housing estate being built off of Wetherden Road. Has this been considered? Is it wise to have an open quarry within meters of people’s homes?

Extend the quarry site to the space remaining between the Sandy Lane path, Warren Lane and the old A45.

Mitigation measures should be possible to protect the amenity of nearby residents. Full assessment of the impact, which will determine what measures are required to bring these impacts to an acceptable level. These assessments will need to take into account the permitted housing and an appropriate standoff between the area of extraction and the permitted housing. The extension can only be granted planning permission once it has been demonstrated that appropriate mitigation measures can be implemented.

Future planning applications on this site will be an opportunity to improve planning conditions and address some of the issues raised by residents.

90294492  Mr David Brown  (received via post)  No  The application will necessitate an unacceptable diversion of an existing and well established public right of way. The application will bring the operation of the quarry unacceptably close to the proposed new housing developments along Wetherden Road, Elsmwell, with the subsequent noise, dust and considerable risk to the public. The current operation does not fulfill its environmental obligations with regard to silt run off from the works to the surrounding fields and footpaths. This happened recently when the silt lagoon breached and silt to enter a watercourse. The Environment Agency were informed, but there is no evidence of any enforcement action. The current operation does not have a secure boundary and there are excavation daces that are unstable. Both of these items constitute breaches of Health & Safety legislation with regard to safety workforce and safety of the public.

I trust these observations are of use in informing the decision of the Planning Inspector.

The Application should be rejected.
Additional noise + dust nuisance moving closer to or colliding with expanding housing development is unacceptable. The footpath diversion will be unacceptable.
No consideration for extension of the quarry should be granted until the works boundary is secure and issues regarding short tears slope stability have been addressed. These constitutes breaches of health and safety legislation. The application to extend the quarry should be rejected as unsound as the current operation breaches legislation with
regards to mud on the public highway and illegal discharges of silt into watercourses.

90388153  Jen Larner (received via email), Parish Clerk, Wetherden Parish Council

-  -  -  Wetherden Parish Council VERY STRONGLY OBJECTS to any further expansion to the Lawn Farm Quarry site on the following basis:

1. The proposed site is too close to the highly populated village of Elmswell, with the edge of it approx. 140m - 160m away from current homes. The imminent development of 240 homes adjacent to the site will further exacerbate this and effectively puts the site in the village of Elmswell, rather than next to it. This is unacceptable. Noisy, dusty, light polluting sites such as these should be very far from large conurbations.

2. The current lax operating conditions, agreed by Suffolk County Council, and their interpretation and implementation by AGGMAX means that there is inadequate control over the operator and as such, the management of the current site falls below acceptable standards. The following issues have been a persistent problem since AGGMAX began operating from this site.

   • There is continual mud on the road at the site exit which reduces stopping distances and increases the chance of skidding, making the road unsafe. This has been documented and evidence sent to SCC. Locals have now been advised to contact the POLICE for any action to be taken, as SCC is unable to enforce road safety under the current operating conditions.

   • Frequent and persistent failure to comply with working hours. Reports of out of hours activity have been submitted to SCC planning enforcement and the district councillor along with evidence.

   • The conditions in the current contract leave much wriggle room and make it difficult to enforce. The right for the peace and quiet of residents continues to be disregarded.

   • Dust, noise and bright lights frequently come from this site at unacceptable levels with over 100 documented complaints to this effect. This must be a grave physical and mental

1. Mitigation measures should be possible to protect the amenity of nearby residents. Full assessment of the impact, which will determine what measures are required to bring these impacts to an acceptable level. These assessments will need to take into account the permitted housing and an appropriate standoff between the area of extraction and the permitted housing. The extension can only be granted planning permission once it has been demonstrated that appropriate mitigation measures can be implemented.

2. A recent variation of planning allowed a rewording of some of the conditions.

3. The plan does contain a 31% oversupply within the plan period. This is in order to provide flexibility in the supply of aggregates, in the case that sites do not come forward, and due to the potential for increased housing delivery across Suffolk.
health concern. There is particular concern about early morning sleep loss and stress due to repetitive loud noise as well as the effects of particulates contained in the dust. No dust monitoring has occurred since 2011 and since 2014 there has been no requirement to monitor these. It is our view that AGGMAX is taking advantage of these lax conditions to reduce its standards of operation.

- The bunds installed to prevent the worst of noise and air quality pollution are insufficient.
- The fencing to prevent people from accessing the site is flimsy and in many places broken. As the proposed new site would back onto a playground there is huge safety concern.
- Such are the concerns of local residents that a Liaison Committee was set up to enable constructive discussions to take place. Members of the public have now been banned from this group meaning less transparency and options for raising concerns.

3. The current proposals allow for an over provision of aggregate (to the extent of 30%). This seems to be a large potential increase which seems out of proportion to any change in demand, or margin for error. We therefore question the need for all the proposed extensions.

The conditions imposed on AGGMAX by SCC currently are insufficient to ensure the safety and health of local residents. There is every reason to assume that the persistent and flagrant flexing of the conditions by AGGMAX will continue. Such a site should not be allowed to operate in such a highly populated area.

Mitigation measures should be possible to protect the amenity of nearby residents. Full assessment of the impact, which will determine what measures are required to bring these impacts to an acceptable level. These assessments will need to take into account the permitted housing and an appropriate standoff between the area of extraction and the permitted housing. The extension can only be granted planning permission once it has been demonstrated that

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<th>90445357</th>
<th>Mr Anthony Ball</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Lawn Farm Quarry Wetherden. I wish to object to the proposal to expand Wetherden Quarry as set out in the Suffolk Minerals and Waste Local Plan Preferred Options. We already suffer from a lot of noise, dust and disturbance at the best of times when digging, earth moving etc is going on and the potential retrospective granting of permission for concrete processing will only add to the already unsatisfactory situation. The existence of bunding / screening does NOT stop these intrusions I am an</td>
<td>Mitigation measures should be possible to protect the amenity of nearby residents. Full assessment of the impact, which will determine what measures are required to bring these impacts to an acceptable level. These assessments will need to take into account the permitted housing and an appropriate standoff between the area of extraction and the permitted housing. The extension can only be granted planning permission once it has been demonstrated that</td>
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emphysema sufferer and the dust created that drifts over my property particularly in dry weather adversely affects my breathing. There seems to be no real restriction on the times the quarry is active so these problems are unlikely to improve and to let this quarry operate even closer to houses can only increase the problems.

Future planning applications on this site will be an opportunity to improve planning conditions and address some of the issues raised by residents, including amenity issues related to dust and noise, and issues with mud on the road.

The current quarry operations are permitted to operate between 7am and 6pm on Mondays to Fridays and 7am to 1pm on Saturdays. They also have the ability to perform essential maintenance outside of these times, however conditions will be placed on future planning applications on the site to limit when essential maintenance can take place.

Mitigation measures should be possible to protect the amenity of nearby residents. Full assessment of the impact, which will determine what measures are required to bring these impacts to an acceptable level. These assessments will need to take into account the permitted housing and an appropriate standoff between the area of extraction and the permitted housing. The extension can only be granted planning permission once it has been demonstrated that appropriate mitigation measures can be implemented.

1. Mitigation measures should be possible to protect the amenity of nearby residents. Full assessment of the impact, which will determine what measures are required to bring these impacts to an acceptable level. These assessments will need to take into account the permitted housing and an appropriate standoff between the area of extraction and the permitted housing. The extension can only be granted planning permission once it has been demonstrated that appropriate mitigation measures can be implemented.

2. A recent variation of planning allowed a rewording of some of the conditions.

3. The plan does contain a 31% oversupply within the plan period. This is in order to provide flexibility in the supply of aggregates, in the case that sites do not come forward, and due to the potential for increased housing delivery across Suffolk.

Please see below comments and objections to the inclusion of Lawn Farm Quarry in the Local Plan preferred options - June 2018

Tony Couzens OBJECTION to the inclusion of Lawn Farm Quarry Wetherden in the Suffolk Minerals and Waste Local Plan Preferred Options dated June 2018

Proximity to Residential Properties

The proposed extension will increase significantly the number of properties and people affected by the activities at this site. Considerably more properties will be affected when the recently approved housing development in Wetherden Road comes into being in the very near future, up to an extra 240.

It is difficult to identify exact numbers for all the sites where extensions are proposed because the reports about the number of properties are a bit vague e.g. "a number of properties". However looking at the site plans it seems to me that Lawn Farm Quarry, Wetherden will affect considerably more residential properties than of any of the other sites.

Noise

At the current operational distance neighbouring properties are subjected to frequent loud bangs and crashes, beeps from HGVS and diggers, noisy materials being processed which can often be heard through closed double glazing and certainly makes having windows open or trying to enjoy
use of gardens in summer an unpleasant and distressing experience. The bunding and screening required by the current permissions, which we were advised would stop this, is clearly ineffective and inadequate.

**Dust and Air Quality**
The amount of dust generated, especially in dry weather (despite the contention from expert opinion that it wouldn't travel beyond the current boundary) does already travel to neighbouring properties contaminating air quality, washing, window ledges etc. It is obvious that this will have a detrimental effect on the medical condition of those with lung problems.
The non technical specifications (9.2) from 2009 currently require, among other things, access roads and hauls to be periodically damped down. To my knowledge this has never happened even during long spells of dry weather. The dust clouds created by movements within the site rise well above the bunding / screening and can clearly be seen drifting over the current site boundaries. The prevailing wind direction means the dust clouds are driven predominantly towards the neighbouring properties. I understand that monitoring of this aspect ceased in 2014 which means it has not been investigated since the quarry started operations.

**Mud on the road**
There is a long history of complaints which at this time I believe remain unresolved. After nearly three years of these complaints SCC advised that they were unable to deal with the dangerous conditions this creates on the adjacent roads and issues should be reported to the Police. I understand that recently a more robust attitude has at last been taken by SCC but as far as I know after another 8 months the problem remain unresolved.

**Failure to comply with Working Hours**
Workings have been seen and heard as early as 06:30 and as late as 21:00. These workings have also been seen and heard at weekends and it is not unusual to see and hear Saturday afternoon and Sunday working. To my knowledge over 100 reports of out of hours activity have been sent to Jo Lloyd (SCC planning enforcement) or County Councillor Andrew Stringer. Obviously these are only the incidents observed and people have taken time to report, doubtless there are many more unreported incidents.
Despite these reports to SCC the violations continue unabated.

**Lack of control of activities on the site**

The County Councillor for Wetherden (Andrew Stringer) at a meeting of Wetherden Parish Council on 14 November reported that SCC did not get the planning conditions/permissions right in the first place which has left them with difficulties trying to enforce them. At a meeting of Elmswell Parish Council held on 20 November the Clerks report from the 17 November 2017 Lawn Farm Quarry liaison meeting states "The regulatory authorities, mainly SCC, do not have the resources to deal with the degree of monitoring and surveillance required to regulate activity on sites such as this. Given the proximity to the communities of Elmswell and Wetherden this is bound to lead to an unsatisfactory outcome." This means there is inadequate control over the operator at this site who, since at least 2014, has shown no signs of adhering to the current planning permissions/conditions. In my opinion permission to expand operations closer to residential properties should not be considered.

**Amount of Provision needed**

I understand that the current proposals allow for a 30% over provision of aggregate etc this seems to be a very high margin for error or change in demand and I feel not all the proposed extensions are strictly needed.

**In Conclusion**

The above points have already been put to SCC in the November 2017 consultation but have all been rebuffed or apparently can be controlled by conditions/permissions. SCC has admitted that they have not been able to control the activities at this site for four years, a factor which appears to be ignored. It is very relevant to those whose lives are affected on a daily basis and whilst SCCs response may be technically correct it seems to me that some common sense needs to be brought into play particularly as it does not seem necessary to have such an over provision (30% +).

In my view the close proximity to existing and an expanding number of residential properties, noise, dust, road safety issues, the failure by the operator to adhere to the planning conditions together with the inability of SCC to enforce compliance should make it unthinkable and irresponsible to even consider allowing expansion which will bring all these
issues closer to existing and a soon to be growing number of neighbouring residential properties.

**Further OBJECTION to the inclusion of Lawn Farm Quarry Wetherden in the Suffolk Minerals and Waste Local Plan Preferred Options dated June 2018**

It has been admitted that due to inadequacies / omissions / vagaries in the permissions granted in 2009 that it has not been possible to enforce many of those provisions. This has left the County Council unable to deal properly with ongoing problems and complaints from nearby residents about noise, dust, air pollution, working outside of hours and the dangerous contamination of the road used to enter and exit the quarry. I have been advised that these same conditions will have to be applied to the proposed extension area. I believe that this will be in contravention of several sections of the National Planning Policy Framework which I have listed below.

**Point 109 Bullet Point 4**

Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;

**Point 123 Bullet Point 1 and 2**

- avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;

**Point 143 Bullet Point 6**

- set out environmental criteria, in line with the policies in this Framework, against which planning applications will be assessed so as to ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health, including from noise, dust, visual intrusion, traffic, tip- and quarry-slope stability, differential settlement of quarry backfill, mining subsidence, increased flood risk, impacts on the flow and quantity of surface and groundwater and migration of contamination from the site; and take into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality;

**Point 144 Bullet Point 3**
| 90769611 | Mr & Mrs Philip & Joanna Gordon (received via email) | - | - | - | We strongly object to the proposed extension to Lawn Farm Quarry because of the following:
- The extended quarry will only be 50m from our property! A real worry for our quality of life. We bought this property before the current quarry was even planned, let alone its cement production/processing plant etc.
- The extended quarry will be far too near Elmswell. Quality of life for its residents will be badly affected.
- The noise and dust will be carried directly onto us with the West/South West prevailing wind. The current quarry is due South of us and although we are badly affected by dust and noise.

1. Mitigation measures should be possible to protect the amenity of nearby residents. Full assessment of the impact, which will determine what measures are required to bring these impacts to an acceptable level. These assessments will need to take into account the permitted housing and an appropriate standoff between the area of extraction and the permitted housing. The extension can only be granted planning permission once it has been demonstrated that appropriate mitigation measures can be implemented.

2. A recent variation of planning allowed a rewording of
noise it would be 100x worse with the West/South West extension.
- We are already badly affected by dust. NO dust monitors are in place! If the dust were monitored I am positive even current level would break legal limits. The quarry operators say they dampen down the dust but it makes little or no difference what so ever. Once in the air the operator blags no control where settling occurs. The extension would make our life here absolutely intolerable! The current dust is horrendous and constantly coats our house, garden, furniture and fabrics within. We have to keep windows closed throughout the summer - dreadful to have to do this in the heat. By no means can we use a clothes line to dry things (neither will the residents of the new Crest Nicholson housing estate).
- We are already badly affected by noise. I work from home and my wife is a housewife and here most days. We are already badly affected from the noise of the vehicles working within the quarry despite "white noise" reversing alerts on the vehicles. An extension to the quarry would not only make this worse but prolong the noisy operation lifetime of the quarry.
- RESPIRABLE CRYSTALLINE SILICA is invisible fine dust generated when quarrying and processing aggregates. SILICOSIS/BRONCHITIS/CANCER concerns for us from the current air quality and it will only get worse. My wife’s asthmatic condition is antagonised by the current quarry during the dry, dusty summer months let alone an extension. Please research all conditions affected by fine dust properly - these conditions have really serious consequences.
- 240 houses being built adjacent to the proposed extension site. I am sure there will be plenty of asthmatics within the new population. Residents can be affected by dust up to 0.5k away. Imagine how it affects us at 50m away. Think lawsuits.
- The quarry will require the closure of the current footpath which runs through the proposed site which will result in us having to endure far more foot traffic on the other path which runs down the side of our property.
- The current quarry has no proper security. New housing development will no doubt have many bored and curious children to run riot in it.

3. The plan does contain a 31% oversupply within the plan period. This is in order to provide flexibility in the supply of aggregates, in the case that sites do not come forward, and due to the potential for increased housing delivery across Suffolk.
- Apparently the land was previously used as a dump and allegedly it is full of disused cars and general heavy duty rubbish. There are plenty of local people who remember it well.
- Visual impact. The quarry and its ineffective bunds are a huge blot on the landscape.
- Market Value of our House. Although not a planning consideration this proposed extension of the quarry will no doubt drastically devalue our property and those properties in Elmswell overlooking the proposed extension site. We would ask you and the Council to NOT to proceed with this extension. With the over development of Elmswell and now this proposed extension to Lawn Farm Quarry where does it all stop!
### 17. WHERSTEAD

**Policy MS9**

<table>
<thead>
<tr>
<th>Reference Number</th>
<th>Respondent</th>
<th>Legally compliant?</th>
<th>Sound?</th>
<th>Compliance with duty to co-operate?</th>
<th>Representation</th>
<th>SCC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>90762482</td>
<td>Mr Tom Hill, Chairman, The Stour and Orwell Society</td>
<td>No</td>
<td>No</td>
<td></td>
<td>This proposal is deeply disappointing and objectionable. This site is said to comprise an “extension” to an existing site. However, despite being allocated for nearly two decades, the adjoining land is not an “existing site”, because nothing of substance has ever happened there. A few mounds were dug to implement the decade old permission, but these have only been used by unlawful scrambling motorbikes to the great distress of neighbouring landowners, residents and riders on the adjoining bridleway. The police have been called out on numerous occasions. This reason that it has not been worked land is that it is simply not worth the candle as an aggregates site. The same is true of the “extension”. The deposit is of too poor a quality and too shallow to make it worthwhile allocating. 0.5Mt off 11hectares is a very poor return for the blight and disruption caused. This western “extension” lies right up against a highly attractive and valuable mosaic of ancient woodland, full of protected species. Indeed, protected species in this area were recorded in numbers on the land in question when the recent temporal extension of permission for the “existing” site was approved. This issue does not appear to have been considered in advance of now proposed allocation. It is not possible to see in the evidence base where the Council has assessed the ecological value of the proposed extension, which is known to be extensively populated by protected species. The whole area lies within the Babergh District Council’s designated Dodnash Special Landscape Area.</td>
<td>The geological evidence for this site can be found in the site selection report for the site, which details the quantity and quality of aggregate within the site. This evidence shows that there is workable material within the site. Surveys will be required in order to ascertain the potential impacts to ecology from minerals operation, including to the mature woodland which are County Wildlife Sites. The surveys must be used to identify any mitigation that will be required to make mineral extraction acceptable in this site. Detailed assessments of ecology will be required at the planning application stage, however the Site Selection Report does contain a high level assessment of site ecology. Public Rights of Way, including the bridleway mentioned are addressed in paragraph 16.18 of the plan. The routes are to be unobstructed by the extraction, with a standoff area required. A footpath does run through part of the site, which will be diverted. The site is visually contained so that views into the site from wider are are limited. In some cases inert waste are used to aid restoration by bringing the profile of the land back to its original level. It should be noted that inert waste is not the same as household or commercial and industrial waste. Inert waste is typically soils, clays and other waste materials from construction or demolition. It is</td>
</tr>
<tr>
<td>Reference</td>
<td>Name</td>
<td>Email</td>
<td>Comments</td>
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<tr>
<td>90818618</td>
<td>Farah Chaudry</td>
<td>(received via email) , Team Leader, Norfolk &amp; Suffolk, Natural England</td>
<td>Many attractive and much used by walkers and riders. If a very substantial “stand off” is intended, why show the boundary right up to the ancient woodland? A full and generous margin should be excluded. Indeed the land proposed for allocation includes a very popular and well used bridleway. How is this to be addressed? Most disturbing is the suggestion that “some inert waste material might be required to aid restoration” (para.16.1). From where has this suggestion emerged? The “deposit” is extremely shallow, which has always been known. The topsoil is to be stripped and then replaced after working so that the land is restored to agriculture. Inert waste is NOT required and is NOT consistent with restoration to agriculture. At the very least, this reference must be dropped. SOS seeks the deletion of this site. Possible that the waste will not be required, but land used to dispose of inert waste can be restored to agriculture. Full details of how a site is restored are determined at the planning application stage.</td>
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</tr>
<tr>
<td>90740351</td>
<td>Mr Steve Merry</td>
<td>(received via email) , Transport Policy and Development Manager, Suffolk County Council</td>
<td>No additional comments</td>
<td>Noted.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>90766836</td>
<td>Miss Charlie Christensen, Planning</td>
<td></td>
<td>We welcome the inclusion in the Policy that the potential for impacts on the Groundwater Source Protection Zone (SPZ) in section c. However, we feel this paragraph should be moved reference to the “Ground Water Source Protection Zone” from part “c” of the policy to part “g” of Policy MS9.</td>
<td></td>
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<tr>
<td>Advisor, Environment Agency</td>
<td></td>
<td>clearer as the SPZ is currently listed under nature conservation which is misleading. We would like to see section c. reworded to ‘potential impacts upon the Groundwater Source Protection Zone and nature conservation interest including…’</td>
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<tr>
<td>Bethany Philbidge (received via email), Planning Officer, Suffolk Preservation Society</td>
<td>-</td>
<td>-</td>
<td>However MS9: Wherstead and MS7: Wangford continue to set out different approaches; schemes of archaeological investigation being required pre-application for the Wangford site but secured via planning condition for the Wherestead site. SCC are advised as to the appropriate archaeological strategy by the SCC archaeology unit.</td>
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### 18. WORLINGTON

**Policy MS10**

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<tr>
<th>Reference Number</th>
<th>Respondent</th>
<th>Legally compliant?</th>
<th>Sound?</th>
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<th>Representation</th>
<th>SCC Response</th>
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</thead>
<tbody>
<tr>
<td>90818618</td>
<td>Farah Chaudry (received via email), Team Leader, Norfolk &amp; Suffolk, Natural England</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Policy MS10: Worlington We advise amending the wording in relation to nature conservation to include the following: a) 'likely adverse effects (either individually or in combination with other developments) on the notified special interest features of Red Lodge Heath SSSI…. etc.'</td>
<td>Cumulative effects of minerals sites with other development is covered in policy MP5 and it would be considered unnecessary duplication of policy to include this in each site.</td>
</tr>
<tr>
<td>90738423, 90743172, 90757527</td>
<td>Mr Peter Dawes, Head of Planning and Estates, Frimstone Ltd</td>
<td>Yes</td>
<td></td>
<td></td>
<td>Support Policy MS10 It is considered that the above policy meets the test of soundness as set out in paragraph 182 of the National Planning Policy Framework (NPPF) as evidenced by the following: Positively Prepared The policy has been developed to meet objectively assessed development and infrastructure requirements for the plan period. The landbank has been based on the 10 year average rolling sales information set out in annual monitoring reports and recent LAA's and also includes an assessments of future demand for major infrastructure projects within the plan area. The Plan also provides a degree of flexibility in its allocations to help ensure demand set out in the plan can be met. Justified The areas covered by Policy MS10 are extensions to an existing operational site. They will be worked using similar technics to those employed on the existing site and will utilise the existing site infrastructure and access to the public highway network. They are considered to represent the most appropriate strategy when considered against reasonable alternatives. Effective The areas covered by Policy MS10 are extensions to an existing operational site. They will be worked using similar technics to those employed on the existing site and will utilise the existing site infrastructure and access to the public highway</td>
<td>Noted.</td>
</tr>
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</table>
network. The reserve calculations are based on borehole and trail pit surveys which provide physical evidence of the extent and quality of the minerals in the areas concerned. It is therefore considered that the plan is effective in relation to policy MS10 as the areas covered are deliverable over the plan period. Consistent with National Policy At the heart of the NPPF is the presumption of sustainable development. The NPPF indicates that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles covering each area. The areas covered by Policy MS10 contribute to each dimension as follows:

- **Economic** - they provide mineral reserves in the right place and at the right time to support predicted growth within and beyond the plan area. The inclusion of the areas assist the authority to provide a coordinated approach to the supply of minerals for development over the plan period.

- **Social** - they will help support the supply of housing and high quality build environment reflecting the communities needs and supporting its health, social and cultural well-being. The areas will provide raw materials for use in local and regional housing and infrastructure development.

- **Environmental** - they promote the prudent use of natural resources, minimise waste and pollution and help in moving to a low carbon economy. The areas adjoin an existing operational site and will utilising the existing site infrastructure and access to the public highway. It is therefore considered the areas identified in Policy MS10 will assist in delivery of sustainable development in accordance with the policies in the NPPF.

<p>| 90740351 | Mr Steve Merry (received via email), Transport Policy and Development Manager, Suffolk County Council | Worlington | Noted. |</p>
<table>
<thead>
<tr>
<th>Reference</th>
<th>Name</th>
<th>Role</th>
<th>Response</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>90766995</td>
<td>Miss Charlie Christensen</td>
<td>Planning Advisor, Environment Agency</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>90820325</td>
<td>Amy Wright</td>
<td>Senior Planning Policy Officer, West Suffolk District Councils</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>90119573</td>
<td>Mr F W Turner</td>
<td>(received via post)</td>
<td>-</td>
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</table>

Floids refers to the consultee rather than the subject matter.

Move reference to the “Ground Water Source Protection Zone” from part “c” of the policy to part “e” of Policy MS10.

The potential for ecological effects has been addressed in policy MS10 part b) and includes impacts on the Breckland SPA, Breckland SAC, Breckland Flora CWS, Ground Water Source Protection Zone, European Protected Species, Priority Specieis, and Priority Habitats.

The Suffolk Waste Survey did not identify need for any further waste management facilities within Suffolk. As such the plan does not allocate any waste sites with the exception of Sizewell, which recognises that there is potential for storage of nuclear waste from other sources at this site. There is however a need to include policies within the plan, which set out criteria for waste facilities, should additional facilities be proposed. The Site at Worlington may be restored through the importation of inert waste. This is not household or commercial waste, but is typically waste from construction and demolition consisting of soils, clays, and other inert materials. This is used to help raise the level of the land back to, or close to its original level.
| 89917709 | mr darren fitch | Yes | Yes | No | No information provided on likely sound impact or working hours of the application. We can already hear the quarry working on certain days. We would like to see more detailed plans of noise bunding and dust suppression proposals as part of consultation. | Noise and dust mitigation measures will be required at the planning application stage, when more detailed assessments of these issues are available, as they will be required. Noise mitigation measures are required by Policy MS10. |
### 19. Sizewell A Nuclear Power Station

**Policy WS1**

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<tbody>
<tr>
<td>90818618</td>
<td>Farah Chaudry (received via email), Team Leader, Norfolk &amp; Suffolk, Natural England</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Policy WS1: Sizewell A Nuclear Power Station</td>
<td>Amend wording of Policy WS1 to read:</td>
</tr>
<tr>
<td>90772535</td>
<td>Mr Mike Jones (received via email), Conservation Officer, RSPB</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>The proposed allocation is in close proximity to Sizewell Marshes SSSI. In order to ensure to safeguard the ecological interest of this designated site, it is appropriate that the policy wording should reflect the need for careful assessment prior to any permission being granted.</td>
<td>Potential impacts on Sizewell Marshes SSSI are accounted for in part &quot;b&quot; of this policy</td>
</tr>
</tbody>
</table>
Paragraph 19.11 – Ecology

At the Preferred Options stage, GVA also made comments in relation to allocation W1 (Sizewell A) and the supporting text provided in Chapter 19, primarily concerning paragraphs 19.11 and 19.18. In SCC’s ‘Responses’ document, the Council have responded to this element of our representation by stating that the AONB reference will be removed from the ecology section. However, despite the intention of the Council noted in the ‘Responses’ document, this change has not been made in the Submission Draft. This appears to be a consistent issue as we have noticed at least one other instance where the Council has stated a change will be made in the ‘Responses’ document, but has not carried that intention through to the Submission Draft.

Paragraph 19.18 – Floods

The Council’s ‘Responses’ document provides no commentary on the detail provided in respect of surface water and groundwater flooding in GVA’s letter of 11th December 2017. With regards to groundwater flooding, as previously stated Sizewell A site was raised considerably over the surrounding land when it was built, and therefore groundwater level would be expected to be well below current site ground level, and this is demonstrated to be the case by site groundwater monitoring. There is a series of groundwater monitoring boreholes at the site which show that groundwater is always well below (by more than 7m) current site ground level at Sizewell A. Even at high tide, the site is not at any risk of ground-level flooding from groundwater (time-series data during the tidal cycle are available). The “high/intermediate risk of groundwater flooding” statement at paragraph 19.18 is therefore factually incorrect. As stated in our previous representations, the risk of surface water flooding from extreme rainfall events is also over-stated. The Environment Agency maps indicate that only a very small proportion...
of the site is at risk and these areas are restricted to access roads and hard standing. Magnox’s internal flood risk consultant reviewed the position in respect of surface water flooding at the site and has confirmed that surface water flooding from extreme rainfall (and indeed from local watercourses or from the sea) is not a significant risk at the site (please see Annex 1 of this letter).

Both groundwater and surface water would be assessed in more detail in respect of specific applications, as and when they arise.


20. APPENDICES

APPENDIX 1
No comments received

APPENDIX 2
No comments received
### Appendix 3

<table>
<thead>
<tr>
<th>Reference Number</th>
<th>Respondent</th>
<th>Legally compliant?</th>
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<th>Compliance with duty to co-operate?</th>
<th>Representation</th>
<th>SCC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>90767138</td>
<td>Miss Charlie Christensen, Planning Advisor, Environment Agency</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>We have the following specific comments related to the below sites listed in Appendix 3: 1. Site reference WTF 24: The site name ‘Risby Recycling and Composting’ is misleading as there is no composting undertaken at this site, and the permit does not allow it. This is a wood recycling site. 2. Site reference WTF 32a – c: We are not aware of a Mr Clive Tyler operating any waste facility. These could possibly be Whites Recycling Ltd, however this will require clarification. 3. MELV1: B McGivern – Bridge End Dismantlers is not currently permitted by us, although is still operating. We understand that B McGivern is no longer the operator, so this may need to be updated. 4. MELV18: Gowing Autospares Risby ELV Facility is no longer a permitted waste facility, the site is closed.</td>
<td>Delate reference to Gowing Autospares.</td>
</tr>
<tr>
<td>90348828</td>
<td>Ann Barnes, Principle Planning Officer, Cambridgeshire County Council</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Thank you for consulting Cambridgeshire County Council as an adjoining Mineral and Waste Planning Authority on the Submission Draft Suffolk Minerals and Waste Local Plan. I have not identified any issues which, in my view, would indicate that the plan is unsound and / or not in legal compliance. However, in the interests of clarity I would like to request a minor alteration to the maps shown in the Plan and the Policies Map: In the Draft Plan there are a number of maps that show both areas within Suffolk and adjoining counties, for example, maps FH4 and FH5. On these maps the boundary of the plan area does not appear to be shown. I would like to ask that on these maps that straddle this boundary, that the area outside of the plan area is clearly marked as such, so that the reader is made aware they will need to consult the adjoining authorities’ plans. Please</td>
<td>Add County County boundary.</td>
</tr>
</tbody>
</table>
do contact me on the details above if you have any questions regarding this response.

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>Yes</th>
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<tbody>
<tr>
<td>90586119</td>
<td>Mrs Jayne Neal</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

21. **PROPOSALS MAP**

No comments received
## 22. Sustainability Appraisal

<table>
<thead>
<tr>
<th>Reference Number</th>
<th>Respondent</th>
<th>Legally compliant?</th>
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<th>Representation</th>
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</tr>
</thead>
</table>
| 90747824         | Dr Adrian Lucas (+9 others) (received via email) | -      | -      | -                                 | See representation here: https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/Individual-Reps/L/Lucus-90747824.pdf | General Tables 54 and 75 of the SA reflect a ‘policy off’ appraisal of the site proposal at Cavenham and cumulative effects on the broad area. This has been undertaking looking at the constraints on site(s) and within the site boundary(s). Table 41 respond to a ‘policy on’ appraisal of Policy MS4. The appraisal of Policy MS4 explores whether those effects highlighted in Table 54 are adequately ‘dealt with’ within the Policy criterion. 

This approach to assessing sites and corresponding site policies separately through a ‘policy off’ and ‘policy on’ approach is outlined within Section 9.1 of the SA on page 161. 

The response issued here can be considered to cover all those instances of confusion within the consultation comments surrounding ‘contradictory’ statements. 

SO16 Public Nuisance / Impact on where people live. SO18 Noise/Vibration The SA raises the potential for effects on public nuisance and noise and vibration (SO16 and SO18) due to the proximity of residential properties through the ‘policy off’ appraisal of the site proposal in Table 54. 

These effects are considered to be adequately ‘dealt with’ within the criteria of Policy MS4: Cavenham. This Policy ensures that planning permission would not be granted should mitigation not be provided through an appropriate scheme. The Local Plan is an in-principle (i.e. strategic) document and the
allocation of sites within it does not guarantee that planning permission will be granted if schemes are not considered acceptable. Detailed schemes will be scrutinised at any planning application stage against the policies of the Local Plan. At that stage the adequacy of mitigation, as submitted, will be considered in detail.

SO9. Traffic/HGV Lorries & SO24 Transport
The SA, in assessing sites against SO24, explores whether they have sufficient access to roads of a suitable classification – in this instance the Suffolk Lorry Route Network / Local Access Lorry Routes. The information to determine effect is taken from the Site Assessment Reports for each site, which include comments from SCC Highways. ‘Positive’ impacts have been identified where ‘The proposal has no objection from the County Highways Authority and access is directly onto the Suffolk Lorry Route Network’ in order to ‘promote efficient movement patterns in the County (where possible).’ This is outlined within The Sustainability Framework for the assessment of site options (Table 4 of the SA, page 69).

Regarding impacts on neighbouring villages, this is also considered through a number of policies (and policy criteria) within the Plan that would have to be adhered to at the planning application stage. These policies are:

- Policy GP4: General environmental criteria (re: vehicle movements, access and the wider highways network); and
- Policy MP5: Cumulative environmental impacts and phasing of workings; and
- Policy GP2: Climate change mitigation and adaptation (re: travel plans)
SO20 Health & Well-being
Positive effects were highlighted in line with SO20, in so far as this objective did not identify any 'additional' effects that were not highlighted for other SA Objectives. The approach to assessing sites against SO20 is outlined within The Sustainability Framework for the assessment of site options (Table 4 of the SA, page 74).

In broader terms, uncertain / negative effects were highlighted for SO16 (To minimise the impacts arising from the minerals and waste developments on where people live), uncertain effects for SO18 (To minimise production of noise at quarries), and uncertain / negative effects for SO19 (To maintain and improve recreation and amenity) which are all related to health under the SA’s 'social' objectives.

SO19 Recreation & Amenity
The approach to identifying cumulative effects is to identify whether there is any 'additional' effects beyond those experienced at individual sites. The cumulative effect for SO19 is highlighted as 'no impact' due to the individual impacts at Cavenham and Worlington not being related to one another i.e. there is no single factor related to recreation / amenity that would experience effects from both sites.

The Plan is an in-principle document, meaning that some of the assessments will not be completed until the planning application stage or through an Environmental Impact Assessment. SA is a strategic undertaking and is relevant to the level of content of the Plan it is assessing. It must be done fairly and consistently using a comparative level of information across site submissions.

SO10 — Air Quality (incl. Dust and Other Pollutants)
The SA explores 'air quality' in regard to transport movements through any Air Quality Management Area, and also related to bioaerosols. Evidence surrounding the effects resulting from dust from...
specific proposals would not be identifiable at this strategic level, and will be considered at the development management stage. The Plan includes criteria regarding dust within Policy MS4: Cavenham and also within:
- Policy GP4: General environmental criteria
- Policy WP5: Open Air Composting
- Policy WP6: In-vessel composting facilities

<table>
<thead>
<tr>
<th>SO6 Effects on Nature Conservation (Biodiversity/Geodiversity), SO4 Impact Landscape Distinctiveness &amp; SO7 Historic/Archaeological Sites</th>
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<tbody>
<tr>
<td>No SA criticism</td>
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<tr>
<th>Proposed Extension Area Unsafe/Safeguarding Area Extends Into Public Areas/Roads/Rights of Way &amp; Nature Reserve</th>
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<tr>
<td>No SA criticism…</td>
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<tr>
<th>SO1 Surface Water/Groundwater &amp; SO8 Flood Risk</th>
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<tr>
<td>The approach to identifying cumulative effects is to identify whether there is any 'additional' effects beyond those experienced at individual sites. The cumulative effect for SO1 is highlighted as 'no impact' due to the individual impacts at Cavenham and Worlington not combining to have any magnified effect on water quality beyond those identified for the individual sites.</td>
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<tr>
<th>SO21 Impact on Local Businesses, Prosperity &amp; Economic Growth &amp; SO23 Impact on Investment</th>
</tr>
</thead>
</table>
| SA effects need to be based on available quantitative evidence. The SA uses consistently available information, in this instance input from the site submissions / call-for-sites forms to identify whether additional employment opportunities would be forthcoming. There is no quantitative and reliable evidence available to determine the effects of minerals and waste operations on existing non-
### 90750323 Dr Adrian Lucas

<table>
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<tr>
<th>No</th>
<th>No</th>
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</table>


Response as previous comments above.

---

### 90762278 Mr James Meyer, Suffolk Wildlife Trust

<table>
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<tr>
<th>Yes</th>
<th>No</th>
<th>Yes</th>
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As raised in our Preferred Options response, we query why a trigger distance of 250m has been used in Section 3.2 Table 4 Objective 6 for assessing impacts on statutory designated sites? Given that the reasons for designation of statutory sites varies, Natural England’s Impact Risk Zones (IRZ) should be used to determine whether a proposed development has the potential to result in an adverse impact on such a site.

Use of Natural England’s Impact Risk Zones in the assessment or sufficient justification for the use of a blanket 250m trigger distance.

The SA in the assessment of sites draws upon the ecological input of ‘Site Selection Reports’ in the first instance rather than ‘proximity testing’. This specialist technical input from SCC ecologists was forthcoming for all sites (see Site Selection Reports and correlation between these findings and that of site appraisals in the SA).

The 250m distance included within ‘Table 4: The Sustainability Framework for the assessment of site options’ (page 69) for SO6 (to conserve/enhance biodiversity or geodiversity) was initially included as a precautionary distance; however the assessment of sites in the SA and the effects highlighted have since been expanded to factor in wider and more holistic effects relevant to specific protection objectives of designations, as undertaken by SCC ecologists.

Table 4 on page 69 of the SA could be updated to reflect the methodology of the SCC ‘Site Selection Reports’ if this is deemed necessary.

---

### 90767232 Dr Natalie Gates, Historic England

| - | - | - |

The sustainability appraisal in respect of Barnham has not assessed the most highly designated and nearest designated heritage assets or taken into account the mitigation measures proposed in MS2 are inadequate (Planning Practice Guidance, paragraph 018 reference ID 11-018-20140306 revision date 06 03 2014).

The SA, on page 194, states that, *The Grade 1 listed medieval church of St Mary lies approximately 350m SW. The site has an extremely high potential for heritage assets with archaeological interest.* A negative effect is suitably highlighted.

Both positive and uncertain effects were highlighted in the appraisal of Policy MS2, to reflect in turn the Policy’s inclusion for the requirement of *the provision of an archaeological field evaluation and deposit modelling for palaeolithic potential at depth* and also the lack of a criterion requiring the Grade I Listed Church of St Mary.
Further, in Section 12.3.3 of the SA (page 297), the SA makes recommendations for the Plan at the Regulation 19 stage. These include, (regarding Barham):

- Policy MS1: Barham - It is recommended that the Policy be expanded to seek the submission of an appropriate impact assessment regarding the Grade I listed medieval church of St Mary to accompany any planning application, with mitigation measures included where relevant.
- Policy MS2: Barham - The Policy could seek the submission of an appropriate impact assessment regarding listed buildings, with mitigation measures included where relevant.

These recommendations are considered sufficient for a strategic level assessment on the basis that detailed level mitigation and impacts will be identified at the development management stage.

At the time of writing, ‘statutory habitats sites’ was included as a catch all term to include SSSIs, SACs, SPAs and Ramsar sites. Since then, the NPPF 2018 has introduced the term ‘Habitats Sites’ to reflect SACs, SPAs and Ramsar sites only. If required, the SA can action the recommendation of Natural England in referring to ‘SSSIs, SAC’s, SPAs and Ramsar sites’ within Table 4.

The SA is a strategic undertaking in the knowledge that certain effects can be mitigated at the development management stage. The SA raises the issue that mitigation is needed, but has not considered any detailed scheme / planning application against which the suitability of mitigation could be discussed. The impacts raised regarding landscape are intended to guide policy (either thematic or site-specific) to ensure that mitigation is explored by any developer / site promoter at the application stage.

Policy MP1: The SA identified that there will be negative effects on landscape for Policy MP1 but no mitigation measures are proposed. We advise that mitigation measures need to be identified where there is potential to impact on nationally designated landscapes, i.e. AONBs.

Policy MS1: Barham: We would like some clarity regarding the Sustainability Appraisal for Policy MS1. Section 9.2.1
states that the Policy can be seen to address impacts on Sandy Lane Pit Barham SSSI suitably; Table 38 shows a positive score for biodiversity/geodiversity, however Table 51: Site appraisal for Barham allocation shows the Sustainability Impact to be negative for biodiversity/geodiversity. There appears, therefore, to be a contradiction in relation to the findings of the SA in relation to this policy.

Policy MS7: Wangford: We would like some clarity regarding the Sustainability Appraisal for Policy MS7. Table 44: Impact on Sustainability Objectives: Policy MS7 shows a positive score for the landscape/townscape objective whereas Table 57: Site appraisal for Wangford allocation indicates a negative outcome for the landscape/townscape objective. There appears, therefore, to be a contradiction in relation to the findings of the SA in relation to this policy also.

We agree with the conclusions regarding the Impacts per Sustainability Objective/Theme for landscape and biodiversity/geodiversity in that negative effects for these themes cannot be ruled out. We agree with the recommendations for changes to the Plan where these refer to HRA.

Table 51 of the SA reflects a ‘policy off’ appraisal of the site proposal at Barnham, highlighting a negative effect for biodiversity/geodiversity. This has been undertaking looking at the constraints on site and within the site boundary. Section 9.2.1 and Table 38 respond to a ‘policy on’ appraisal of Policy MS1. The appraisal of Policy MS1 explores whether those effects highlighted in Table 51 are adequately ‘dealt with’ within the Policy criterion.

Table 57 of the SA reflects a ‘policy off’ appraisal of the site proposal at Wangford, highlighting a negative effect for landscape/townscape. This has been undertaking looking at the constraints on site and within the site boundary. Table 44 responds to a ‘policy on’ appraisal of Policy MS7. The appraisal of Policy MS7 explores whether those effects highlighted in Table 51 are adequately ‘dealt with’ within the Policy criterion.

We have studied with interest the preferred options sustainability appraisal for Cavenham Quarry, CA1, CA2 and CA3, as it relates to Impacts, specifically pages 174-178. We have previously objected in writing to the increased activity sought at this site, in terms of its environmental impact (noise pollution, air pollution, and increased traffic and resultant levels of pollution).

However, it seems that there is a glaring omission in the appraisal, in that nowhere is there input from the Highways department on what is obviously going to result in a large increase in lorry flow on the C class roads to access the wider road network via the villages of Cavenham and Tuddenham St Mary. These may well be part of a previously assessed Suffolk Lorry Route Network and designated as Local Access Lorry Routes, although I suspect that this was introduced in bygone times of smaller and lighter lorries, and the SA effects need to be based on available quantitative evidence. The SA uses available information, in this instance input from SCC Highways, to determine transport related impacts in regards to effects of traffic on the environment (SA Objective 9), highway safety (SA Objective 24), human health and wellbeing (SA Objective 20), and air quality (SA Objective 10). This evidence has been utilised consistently for the appraisal of all sites (allocated and alternative) within the SA. The SA is a strategic undertaking and can not always identify detailed effects, instead relying on these to be picked up at the development management stage or through the undertaking of an Environmental Impact Assessment.

As mentioned, input from SCC Highways was sought and received during the Plan’s site selection process,
Highways department should be required to survey existing lorry impact at and around the present site and the villages referred to above to consider current impact and whether that in itself is acceptable in this day and age. Only with that information can any impact from the proposed extension to the site be adequately measured and assessed. Indeed, one could suggest that there is an option for the proposer to be “invited” to provide his own separate access to the A14, and thence the A11, utilising his own tracks across the land. After all, he will have a lot of the raw materials already on site to keep costs down, and profit from the existing workings to fund the work. Additionally, in terms of public relations for both the business and for Suffolk County Council, what a statement of responsible and minimal impact – a “win, win” if ever there was one.

We rest our case, and will watch developments with much interest. Please acknowledge receipt of this representation.

and at the submission stage consultation and utilised within the SA as the most relevant and appropriate evidence at the site level. It states in the Cavenham Site Selection Report that “The County Highways Authority have not object to the proposed highways access arrangements.” The assessment of traffic effects were based on current traffic levels attributed to the quarry, as it is not known what levels of traffic are expected from the extended site. Should a significantly higher level of HGV traffic be proposed in a planning application this would need to be assessed and other access arrangements potentially considered.

It should be noted generally, that thematic Policy exists within the Plan regarding such issues and any forthcoming scheme would have to adhere to this policy content; in short, the allocation of sites within the Plan does not override the requirements of any scheme to adhere to relevant Policy.
23. **Habitats Regulations Assessment**

<table>
<thead>
<tr>
<th>Reference Number</th>
<th>Respondent</th>
<th>Legally compliant?</th>
<th>Sound?</th>
<th>Compliance with duty to co-operate?</th>
<th>Representation</th>
<th>SCC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>90461583</td>
<td>Mr James Meyer, Suffolk Wildlife Trust</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>We have read the documents which form the HRA for the draft Local Plan and we note their conclusions, the documents do not appear to have been updated since the Preferred Options consultation in 2017. As set out in our response to the Preferred Options consultation, we do not consider that the approach taken in the HRA is sound, legally compliant or demonstrates a duty to co-operate, particularly in the way that proposed site allocations have been assessed. We consider that this makes the Local Plan unsound in its current form. The HRA does not appear to follow the prescribed steps required of such an assessment (screening for likely significant effect; Appropriate Assessment) and does not provide any assessment of the potential impacts of the proposed developments on the identified designated sites. Without such consideration being undertaken it is not possible determine whether the proposals, either alone or in-combination with other plans or projects (both within Suffolk and neighbouring counties), are likely to result in likely significant effects or adverse impacts on the integrity of the designated sites. It is not sufficient for the competent authority (in this case Suffolk County Council) to defer this level of assessment to the planning application stage. Also, in the absence of such assessment it is not possible to determine what mitigation measures are required to be secured as part of any site allocation policies. Without a robust HRA we do not consider that the Local Plan could be found “Sound” at examination and we therefore strongly recommend that further assessment is undertaken prior submission. Sites which are found to be likely to result in adverse impacts on the integrity of designated sites should not be adopted. We understand that the HRA is currently being revisited, however in the absence of this work being available our</td>
<td>SCC has revised the appropriate assessment and undertaken an additional focussed consultation.</td>
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</table>
The HRA must be revisited to ensure that it complies with requirements of the relevant legislation and provides a robust assessment of the proposed plan.

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<thead>
<tr>
<th>90772535</th>
<th>Mr Mike Jones (received via email), Conservation Officer, RSPB</th>
<th>No</th>
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<th>Yes</th>
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In our Preferred Options consultation response, we highlighted that there was insufficient evidence in the plan to demonstrate that it would be able to avoid adverse effects on European Sites, and that this left the draft plan unsound and contrary to the requirements of the Habitats Regulations. The HRA presented in support of the Submission stage consultation is identical to that provided with the Preferred Options stage plan, with no reference to our comments on the fundamental problems with the HRA, or the similar concerns raised both by Natural England and Suffolk Wildlife Trust.

The HRA states without evidence in Appendix 3 for all proposed allocations that there will be a neutral effect (i.e. likely negative significant effects would be avoided), typically noting 'until such time as a project-specific HRA screening process and Appropriate Assessment has been undertaken', and 'there may well be other ecological constraints which will need to be assessed and the necessary mitigation strategies agreed'. We disagree with the screening out of these sites in the HRA as no evidence has been provided to allow the Council to safely conclude that these allocations would avoid adverse effects on European sites. This approach effectively abdicates responsibility for determining the Likely Significant Effects and any subsequent Appropriate Assessment of allocations on European sites until the development control stage. This is unnecessary given that assessments based on site locations and constraints can be made at this stage of the plan. It is the responsibility of the Council, as the Competent Authority under the Habitats Regulations, to ensure that the plan will not result in an adverse effect on the integrity of the Natura 2000 network of European sites. Sound planning requires that the Council not rely on the allocation of sites where delivery is uncertain as, regardless of the required

SCC has revised the appropriate assessment and undertaken an additional focussed consultation.
revisions to the plan HRA, the plan can offer no guarantee that project-level HRA would be passed.

We are also concerned about the assertion made repeatedly in Appendix 3, that ‘developers will need to undertake suitable survey work and prepare a detailed avoidance, mitigation, compensation and enhancement strategy’. Notwithstanding our wider concerns, compensation measures as suggested should not be promoted like this. Compensation in a HRA has a strict legal definition and is only for the rarest of situations where avoidance and mitigation of the impacts is not possible, there are no alternative solutions and the proposal is demonstrated to be of over-riding public importance and with the approval of national government. Any plan that proposed compensation as a means of resolving adverse effects on European sites would be unsound and so proposing it as a measure in the plan HRA would be to fundamentally fail the requirements of the Habitats Regulations.

We have recently met with the Council, alongside Natural England and Suffolk Wildlife Trust, to help inform the process of revision of the HRA, in response to the collective concerns raised during the Preferred Options stage. We are pleased to see the direction the Council are progressing in and are happy to provide ongoing support the Council as it revises the HRA in order to ensure it is compliant with the Habitats Regulations but no revised HRA has been produced to date and recognise that our comments in the consultation must refer to the documents as published in the Submission consultation.

We therefore strongly recommend that the plan needs to be accompanied by a HRA that properly follows the tests set out in the Regulations, and provides sufficient evidence to demonstrate that the plan can confidently avoid resulting in adverse effects on European Sites. The current HRA document does not meet these tests and needs significant revision before it can do so. We strongly recommend that the HRA undergoes significant revision, firstly evaluating all sites and policies against the test of Likely Significant Effect (LSE) and then following with an
| 90818618 | Farah Chaudry (received via email), Team Leader, Norfolk & Suffolk, Natural England | - | - | Appropriate Assessment of those elements of the plan where LSE is determined. We also recommend that the HRA documents of neighbouring counties’ adopted minerals and waste plans are used as a guide to the level of detail required in the HRA in order to successfully update it to the necessary level. |

| | | Strategic Habitats Regulations Assessment |
| | | Since the Plan contains site-specific information, we expect to see a consideration of the likely significant effects and, where appropriate, adverse effects on the integrity of internationally designated site features, alone or in combination for each of those proposed quarries/waste disposal sites which are either within or in the vicinity of international sites. For individual site allocations, the Local Plan should set out the mitigation measures required (cross-referencing to the HRA) as well as indicating the need for detailed project level HRA. The current HRA defers all assessments ‘down-the-line’ to project level HRA (Appendix 3) which is unsatisfactory. We understand that the HRA is currently being revised and we are happy to provide comments on the updated version when available. |

| | | A recent judgment from the Court of Justice of the European Union (Case C-323/17 People Over Wind v Coillte Teoranta) has provided authoritative interpretation relating to the use of mitigation measures at the screening stage of a Habitats Regulations Assessment. The judgment concluded that it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site. However, when determining whether the plan or project will have an adverse effect on the integrity of the European site at appropriate assessment, a competent authority may take account of those avoidance and mitigation measures. The Local Planning Authority, as competent authority for the Minerals and Waste Local Plan, should consider this. |

| | | SCC has revised the appropriate assessment and undertaken an additional focussed consultation. |
judgment when undertaking the HRA screening under the Conservation of Habitats and Species Regulations 2017 and may wish to take its own legal advice on the implications of the judgment.

24. **Evidence Base**

*No Comments Received*
### 25. **Other**

#### Other Comments

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<tbody>
<tr>
<td>87982263</td>
<td>Mr Mark Fletcher</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>General • Perhaps something about how it fits with our Local Plans? Something about how Authorities consulted if application in or near to area? We would like to understand how our special qualities and our policies that could be of relevance would be considered in decision making. • The maps don't say where they are; they simply have reference numbers on. Strongly recommend they have a title with the location/settlement included. • There is not much detail in there regarding the Broads and how it has a status equivalent to a National Park. There does not seem to be much commentary about other landscape designations either. This might enable better interpretation of the policies in the Local Plan.</td>
<td>Noted.</td>
</tr>
<tr>
<td>90627302</td>
<td>Natalie Beal (received via email), Planning Policy Officer, The Broads Authority</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Policy GP3 does require that applications should have regard to the Broads Authority Area in terms of location as the area is present on the Key Diagram. Policy GP1 also acknowledges that the presumption in favour of sustainable development does not apply in certain circumstances, as mentioned in footnote 9 of the NPPF.</td>
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<tr>
<td>90627302</td>
<td>Natalie Beal (received via email), Planning Policy Officer, The Broads Authority</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>SCC would be happy to provide GIS files upon adoption of the plan. SCC would also be open to modification which changed &quot;District and Borough&quot; to &quot;Local Planning Authority&quot; in order to be inclusive of the Broads Authority.</td>
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<tr>
<td>90764364</td>
<td>Miss Charlie Christensen, Planning Advisor, Environment Agency</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Chapter 6 explains under “Provision of waste management facilities” section.</td>
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We are therefore disappointed to find little detail in the Plan on how this would be implemented.

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<tr>
<th>90627302</th>
<th>Natalie Beal (received via email), Planning Policy Officer, The Broads Authority</th>
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<tbody>
<tr>
<td></td>
<td>• Page 9, Aim 3: To safeguard minerals and waste development from other development other forms of development by:</td>
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<td></td>
<td>• Page 14, 4.13, ‘but to provide a general list of issues that would were appropriate be taken into account when reaching a decision upon a particular planning application’.</td>
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<td>• Page 16, ‘Minerals and waste development will be acceptable so long as the proposals, adequately access and address the potentially significant adverse impacts upon’</td>
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<td>• Page 19, ‘a proposal for such a facility is included at in the Plan at Cavenham Quarry’.</td>
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<td>• Page 20, ‘There are licences for the dredging of up to 9 Mt of sand &amp; gravel off the coast of the East Anglia on an annual basis’</td>
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<td>• Policy MP8, ‘planning permission will be limited to the end date of the quarry planning permission or the when the indigenous material is no longer being used’</td>
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<td>• Page 29, ‘The Plan also has to take into account of the potential to receive London Waste’.</td>
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<td>• Page 35, 6.16, ‘The recycling of construction, demolition of excavation waste’</td>
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<td>• Page 36, 6.24, ‘This composting has the effect of reducing and ‘The residue is either than landfilled at a reduced taxation rate of processed further to make a fuel’.</td>
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<td>• WP18 ‘or prejudice the use such sites for those purposes unless suitable alternative provision is made’.</td>
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<td>• 5.42: ‘As important as proposing new minerals development is safeguarding existing, planned or potential facilities from other forms of competing development’. Does not make sense. Should this end with something like ‘is equally important’?</td>
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<td>• Sustainability Appraisal The SA does not mention any of the Broads Authority documents. This was raised as part of the last consultation but has not been rectified. It is disappointing that these documents have not been reviewed. Why is this?</td>
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<td>• Page 9 Aim 3 delete additional first “other development” in Aim 3.</td>
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<td>• Page 14 paragraph 4.13 .substitute “where” for “were”.</td>
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<td></td>
<td>• Page 16 Policy GP4 delete “access and”.</td>
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<td></td>
<td>• Page 19 paragraph 5.11 remove “at”.</td>
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<td>• Page 20 paragraph 5.19 remove “the”.</td>
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<td>• Policy MP8 no change proposed.</td>
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<td>• Page 29 paragraph 6.4 remove “of”.</td>
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<td></td>
<td>• Page 35 paragraph 6.16 replace “of” with “and”.</td>
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<tr>
<td></td>
<td>• Page 36, paragraph 6.24 replace”effected” with “effect” and replace “than” with “then” and “of” with “or”.</td>
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<td></td>
<td>• WP18 first paragraph reword to say “use of such”.</td>
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<td>• 5.42 No change proposed.</td>
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<td>• Include list of Broads Authority documents in SA.</td>
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<td>Name</td>
<td>Action</td>
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<tr>
<td>90765245</td>
<td>Miss Charlie Christensen, Planning Advisor, Environment Agency</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>90767232</td>
<td>Dr Natalie Gates, Historic England</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>
| 90818618 | Farah Chaudry  
(received via email) , Team Leader, Norfolk & Suffolk, Natural England | - | - | Proposed Minerals Sites |
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<td>It is our opinion that the phrase which appears at the head of the site specific policies: 'Development will be acceptable so long as the proposals, adequately address the following:' could be clarified (and has an unnecessary comma) and we suggest replacing with 'Development will be permitted providing that planning applications provide sufficient evidence to demonstrate that the following aspects have been addressed satisfactorily:'</td>
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<td>We consider that the wording of those plan policies which may affect designated sites should be strengthened and clarified to make them sound and fully consistent with paragraph 118 of the NPPF. NPPF para 118 refers to 'an adverse effect on the site’s notified special interest features' whereas the Plan policies refer to potential impacts being adequately addressed. It is our opinion that the effects on the designated features should be the key aspect of the impact assessment. We have suggested alternative wording for the sites as required (see below).</td>
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| 90820325 | Amy Wright  
(received via email) , Senior Planning Policy Officer, West Suffolk District Councils | - | - | Page 115 refers to Safeguarding policy WP17, but we believe that it should read policy WP18. |
<p>|----------|---------------------------------------------------------------------------------------------------|---|---|Amend paragraph 22.1 to read WP18 not WP17. |
|          | At the time of commenting, it should be noted that the new NPPF is awaited, with possible revisions to national minerals policy and the NPPG, and implications for the Local Plan. Within the Pre-submission consultation, West Suffolk Councils note: In terms of waste, only Sizewell “A” Nuclear Power Station has been allocated. In terms of minerals, we have comments on three of the proposed site allocations. In December 2017 West Suffolk Councils raised concerns (but did not object) to the following sites in the SCC Issues and Options W&amp;M LP: a. Barnham (sand and gravel site) – current map ref SB1, site ref M2 b. Cavenham (sand and gravel site) – current map ref FH3, site ref M4 c. Worlington (sand and gravel site) – current map ref FH4, site ref M9 |</p>
<table>
<thead>
<tr>
<th>Reference</th>
<th>Contact Information</th>
<th>Response</th>
</tr>
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<tbody>
<tr>
<td>89869054</td>
<td>Mr Peter Palmer, Parish Councillor, Aldeburgh Town Council</td>
<td>Yes</td>
</tr>
<tr>
<td>90120637</td>
<td>Mr Chris Stanek (received via email), Strategic Planning Officer, Peterborough City Council</td>
<td>-</td>
</tr>
<tr>
<td>90383507</td>
<td>Louise Dale (received via email), Safeguarding Officer (Statutory &amp; Offshore) Estates, Defence Infrastructure Organisation</td>
<td>-</td>
</tr>
</tbody>
</table>

**Thank you for consulting Peterborough City Council on the Submission Draft Suffolk Minerals & Waste Local Plan Consultation.** We have been following the progress of the Plan and have also had opportunity to make comment through the East of England Aggregate Working Party. The Council has no further specific comments to make on the Plan at this stage. Please do however keep the Council informed of all future stages of this and future Local Plans.

**Thank you for consulting the Ministry of Defence (MOD) in relation to the above referenced consultation document.** The main concern of DIO Safeguarding when reviewing the Mineral and Waste local plan, relates to the proposed site allocations and the restoration/aftercare scheme. The county of Suffolk has several statutory safeguarding sites within its authority area, these being RAF Lakenheath, RAF Mildenhall, Honington and Wattisham Station. On reviewing the proposed mineral sites MS1, MS2, MS3, MS4, MS5, MS8 and MS10 occupy statutory birdstrike safeguarding consultation zones. Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat as part of any restoration scheme or as part of the phased workings on a quarry site. This is because these types of development have the potential to attract large flocking bird species hazardous to aviation safety. However, on reading the additional information regarding these allocations the restoration for the schemes identified above is dry using inert waste or imported inert materials. If this were to change to wet restoration or if there was potential for wet working as part of the extraction scheme, DIO Safeguarding would need to be consulted. Please note MS6 Tattingstone; MS7 Wangford and MS9 Wherstead fall outside of the statutory safeguarding areas and we have no concerns regarding these allocations.

**Amend Policy GP4 by adding an additional clause “(t) military and civil aviation”**.
Please note the above comments are purely related to the DIO Statutory Safeguarding interests. I trust this adequately explains our position on this matter.

| 90631136 | Mr Steve Taylor (received via email), Town Planning & Heritage Manager, Network Rail | I write in respect of the consultation on the draft Waste and Minerals Plan. Having considered the details of the draft document I can confirm that Network Rail wishes to make the following comments: ‘The railhead at Lowestoft has been disused for a number of years. Due to a re-signalling scheme, commercial length freight trains will be feasible from Q2 2019. This has potential to receive or export minerals products by rail from the site including minerals imported to the adjoining port. There is the potential to serve Sizewell or other locally and nationally significant infrastructure schemes. Expressions of interest from end-users are being sought.’ If you require any further information or details please let me know. | Noted. |

| 90631801 | Mr Archie Onslow (received via email), Programme Manager, North London Waste Plan (Camden) | I am writing on behalf of the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (the “North London Boroughs”) who are working together to prepare the North London Waste Plan (NLWP). Thank you for the invitation to comment on Suffolk’s Minerals and Waste Local Plan – submission draft. I have provided comments below. The North London Boroughs have previously engaged with Suffolk, as part of the duty to co-operate, on waste flows between our areas and we have agreed that recent waste movements are not significant in terms of volume. Most recently in February 2017 we provided comments on Suffolk’s MWLP issues and options draft. Minerals and Waste Local Plan We note that the MWLP approach to London’s waste is “no London Waste has been landfilled within Suffolk for a number of years and therefore it is not considered necessary to plan to receive any.” We agree this is an appropriate approach at this point in time, however the monitoring framework does not include imports and exports. It would be useful if waste flows are monitored regularly and, if there are any significant changes to waste imports to Suffolk from London, this | Amend monitoring framework under Policy WP1 to include “significant changes to patterns of waste management”. |
We have reviewed the Local Plan and wish to make the following comments for information only. It does not appear that there are any particular sites which cross the boundary into Norfolk and we assume that Suffolk LLFA will be providing comment on the whole plan. If there are any sites which do cross the boundary, we would expect that all sources of flooding be accounted for. We note that the Strategic Flood Risk Assessment only considers Fluvial and Coastal flooding from the Environment Agency Flood Map; in Norfolk we would expect that flooding from surface water, groundwater and ordinary watercourses (not shown on the fluvial flood map) are considered prior to development. We do not see that there is a specific policy on the water environment or flooding but would expect that any cross boundary sites ensure that proposed development accounts for surface water drainage changes i.e. including SuDS where appropriate and ensuring that backfill / restoration does not adversely change the drainage of surface water or ground water flow. If there are any works that that are likely to affect flows in a Norfolk ordinary watercourse, then any applicant is likely to need the approval of Norfolk County Council. In line with good practice, Norfolk County Council seeks to avoid culverting, and its consent for such works will not normally be granted except as a means of access. It should be noted that this approval is separate from planning. Further guidance on the information required by Norfolk LLFA for any planning applications that cross the border can be found at https://www.norfolk.gov.uk/rubbishrecycling-and-planning/flood-and-water-management/information-for-developers. Further information regarding consent for works in an ordinary watercourse can be found at https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-watermanagement/information-for-homeowners/consent-for-work-on-ordinary-watercourses Noted.
| 90729849 | Eleanor Johnston  
(received via email), Marine Officer (Planning) East, Marine Management Organisation | - | - | MMO Marine Planning response to Suffolk Minerals & Waste Local Plan Submission Draft Consultation  
Thank you for giving us the opportunity to comment on the Suffolk Minerals and Waste Local Plan Submission Draft Consultation. The comments provided within this letter refer to the document entitled Suffolk Minerals & Waste Local Plan, Submission Draft, June 2018.

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO’s licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the East Inshore and East Offshore Marine Plans are of relevance. The East Marine Plans cover the area from Flamborough Head to Felixstowe, including the tidal extent of any rivers within this area.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance, the Marine Information System and the Planning Advisory Service soundness self-assessment checklist.

Recommendations |
| Correct paragraph 5.43 to read “The East Inshore and East Offshore Marine Plan and The South East Marine Plan”.

Add an additional link to the The South East Marine Plan.  
1. The South East Marine Plan

Part of the area covered by the Suffolk Minerals & Waste Local Plan lies within the South East Marine Plan Area. This is from Landguard Point to the northern bank of the tidal River Stour and includes all of the tidal River Orwell. In the document “Index and Chapters 1 to 6” the South East Marine Plan is not referenced. It is recommended to ensure your plan is ‘sound’ that it includes a reference to marine planning for the south east marine plan area. The South East Marine Plan is currently under development and aims to be adopted in 2020. With no marine plan for this marine plan area we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. In particular The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England’s (and the UK) construction industry. References to the South East Marine Plan and Marine policy statement may be most appropriate in policy MP9 of the Suffolk Minerals & Waste Local Plan, for example.

My colleague, Tom Pavitt, who is the Marine Planning Officer for the South East, met with Cameron Clow from Suffolk County Council in March 2018. He presented about marine planning, the South East Marine Plan and ways to reference marine planning in planning documents. Please let me know if you would like these slides to be resent. The MMO looks forward to continued cooperation with Suffolk County Council in the development of the South East Marine Plan, including potential policies on infrastructure landing facilities.

2. The East Inshore Marine Plan

The area covered by the Suffolk Minerals & Waste Local Plan also lies within the Inshore East Marine Plan Area. Therefore, we would recommend that the east marine plans are considered. In the document “Index and Chapters 1 to 6”, the East Inshore and East Offshore Marine Plans, specifically the policy PS3, is referenced under Policy MP8. This is a good example of referencing to the east marine plans. There are other policies within the Suffolk Minerals & Waste Local Plan which have marine relevance and so it is also recommended that the east marine plans and specific policies are referred to in these sections. For
example, references would be appropriate in policy MP9. Examples of east marine plan policies that you may wish to consider are listed below. Hyperlinks are provided for further information. These policies are provided only as a recommendation and we suggest that your own interpretation of the east marine plans is completed.

• CC1: Proposals should demonstrate that they have taken account of how they may: • be impacted upon by, and respond to, climate change over their lifetime • impact upon any climate change adaptation measures elsewhere during their lifetime Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts.

• BIO1: Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including habitats and species that are protected or conservation concern in the East Marine Plan and adjacent areas (marine, terrestrial).

• ECO1: Cumulative impacts affecting the ecosystem of the East Marine Plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation.

• GOV1: Appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa.

• SOC3: Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference:
  a. that they will not adversely impact the terrestrial and marine character of an area
  b. how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them
  c. how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against
  d. the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts As previously stated, we would also recommend you consult the following references for further information:
Restatement of previous comments.
1. I am responding to your emails sent 30th November 2016 to Knowsley Council, Liverpool City Council, St.Helens Council and Wirral Council regarding the Suffolk Minerals and Waste Local Plan Issues and Options consultation.
2. Knowsley, Liverpool, St.Helens and Wirral alongside Halton and Sefton Councils adopted the Merseyside and Halton Joint Waste Local Plan (WLP) on 18th July 2013. This document provides a waste strategy and policy framework for the Plan Area. For more information visit our website: http://www.meas.org.uk/1093
3. Merseyside Environmental Advisory Service (MEAS) coordinated preparation of the WLP and provide waste planning advice to the Merseyside and Halton Councils, so we have been asked to prepare a joint response to your Duty to Co-operate request.
4. Our comments below are informed by Environment Agency (EA) data sources1 and consider both waste sent (removed) and received from Suffolk. Knowsley
5. In 2015, 2846 tonnes of hazardous waste was received in Knowsley at 3 different waste management facilities. Of these 3 sites just 1 received strategic waste movements2: Future Industrial Services Ltd, Knowsley Industrial Park. This is a large scale facility with significant waste capacity; therefore we see no planning reason why movements of this scale cannot continue to take place.
6. Movements to both of the other sites were very small scale. One of these sites, Remondis UK Ltd, Carr Lane, Prescot had a major fire on 4 December 2016 which caused significant damage and the facility is not currently operational. Any waste sent to this site from Suffolk will need to be diverted elsewhere. However, this is a matter for the waste industry to resolve, as movements are dictated by commercial contract.
7. Very small (non-strategic) quantities of waste were sent to Liverpool and Wirral as well as Halton and St.Helens. Movements of this scale are not likely to raise any

90756894
Mr Andrew Clark, Technical Officer (Environmental Planning), Merseyside Environmental Advisory Service

- - -

Noted.
planning or waste capacity issues. Therefore, unless waste movements increase significantly on 2015 levels no further action is needed.

8. I trust that our response is of assistance, but if you need any further information please do not hesitate to contact me.

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<tr>
<td>90785286</td>
<td>Ms Rowena Fuller</td>
<td>No</td>
<td>No</td>
<td>No</td>
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<tr>
<td>88396840</td>
<td>Mrs Judy Moorhouse</td>
<td>Yes</td>
<td>Yes</td>
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Noted.
### Stowmarket Site Selection Report

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<tr>
<td>89090560</td>
<td>Mrs Lynne Jardine</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>We support the Council's decision not to include the Grove Farm, Creeting St Peter site within the proposed plan. The use of this site would result in noise, dust pollution to local residents which could not be adequately mitigated. A quarry here would cause unquestionably damage to landscape, habitats and Listed buildings.</td>
<td>Noted.</td>
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| 84907722         | Mr Gordon Crosby  (Received via email) | -                  | -      | -                                 | I am writing in response to the public consultation to express my full support for one specific part of the Draft Suffolk Minerals and Waste Local Plan (DSMWLP). I fully support the recommendation to exclude the “Stowmarket” Grove Farm site from the final draft as a site for mineral extraction. To be clear, I am supporting the exclusion of the Stowmarket site from the plan. My justification for supporting this exclusion is unchanged from those set out in the submission I made in December 2017 which are in outline:  
  · Failure to protect the possibly extensive archaeology landscape thought to lie under the site for thorough, future investigation and interpretation.  
  · Detrimental impact on the landscape and amenity of the Gipping Valley for residents and visitors alike, particularly as this is one of the last stretches of the valley to have largely escaped extensive damage from gravel extraction and industrialisation. This should be regarded as a precious resource to be protected against all but the most essential of developments.  
  · Harm to the setting of listed buildings.  
  · Detrimental impact on the ecology of the area. | Noted.       |
- The inadequacy of the local roads to carry HGV traffic inevitably needed to move material between extraction and processing areas of the geographically diverse site, and for the moving additional materials (steel, cement etc), staff, waste and finished products.

For these reasons the “Stowmarket” site should remain excluded from the Draft Suffolk Minerals and Waste Local Plan.

| 89229806 | Mr Nigel Bentley | Yes | Yes | Yes | I wish to record my support for the proposed Plan which I am pleased to see has taken into consideration the objections raised earlier in the process and now excludes the Poundfield Products section around Creeting St Peter. The objections to the inclusion of that section were: Traffic – It is incredulous to note that Suffolk Highways have no objections to this proposed development. It is obvious to anybody who uses Mill Lane that it is unsuited to even the current levels of heavy traffic. The road verges are being eroded by lorries passing one another causing the road edge to subside into the drainage ditches and creating dangerous depressions in the road surface. As motorists, we have been forced onto the verge numerous times in order to allow the passage of a large vehicle. As cyclists we feel exceptionally vulnerable. We understand that within that development plan a new road was proposed. However, that would not reduce our vulnerability and could not be constructed until the land adjacent to the A1120 is developed. In the meantime we would have to contend with increased levels of heavy traffic. Were such development to be allowed, traffic levels would increase beyond those identified in the report by Greenfield Associates on behalf of Poundfield Products. Greenfield has identified 80 lorry movements per day purely to remove sand and gravel. However, with the ready availability of these materials, we could expect Poundfield to expand their operations thereby requiring even more traffic movements to allow the import of more cement and the export of more finished product. Impact on Residents - The gravel pits will be intrusive, noisy, dusty and ugly for at least the 25 years of operation. Thereafter, whilst the plan shows the intention to return the land to agriculture, a | Noted. |
generation on, who will remember the original use for farming? More likely the land will be looked at for industrial use with only its immediate past being considered. There are residences close to the development that will bear considerable impact and the village of Creeting St Peter as a whole will suffer. With regard to the noise and air pollution estimates, we can all play with figures. Currently the land is farmed arable land, hence, the low level noise we get is occasional tractors ploughing, drilling and harvesting once or twice a year. If this development is allowed we will have low level background noise constantly. We’re sure that those proposing the plan will obtain noise level readings that will comply with guidelines, but they probably won’t live with it daily. Similarly with air pollution, instead of occasional tractors, we will have excavators, dump trucks and road lorries six days per week. No Requirement for this Development - SCC Mineral Planning confirm that sand and gravel demand is met by existing quarry developments. Accepted Objections to a previous application remain valid. An application for gravel extraction near the Poundfield plant was rejected 10 years ago for reasons that remain relevant and valid to this larger development. Undermining years of effort on Environmental improvement - The Gipping Valley has received considerable support and effort from local people and Agencies to create and protect a successful haven for wildlife. This development will destroy many years of work to create a special place. Footpaths – Many rights of way and footpaths will be obliterated and the proposals to maintain them are ineffective. The entire proposal based on the report by Greenfield is riddled with non-committal phrases such as: Conceptual Restoration – The area of the site ‘could be restored as an open mosaic habitat’ (4.6.3) and it is proposed that 102 hectares of the site ‘could be returned to Grade 2 agricultural land’ (4.6.2) Emissions – ‘where possible measures will be taken to reduce emissions’ (4.5.2) Flood Alleviation – ‘There may be the potential to provide flood alleviation ponds’ (4.6.4.) Environmental Mitigation Measures - ‘Where necessary advance planting and/or screening of noise attenuation bunds will be constructed using soil and overburden from within the site’ (4.7.3) Public Rights of Way – ‘These will
require temporary diversion during the operational period but could be re-instated in their existing location. Should the proposer re-submit, we worry that, although the proposer seems to have considered all avenues that concern those of us living in the area, these are just platitudes. Twenty five years is a long time to wait and there are no guarantees and plenty of ‘wriggle room’. We know that some of these objections are not relevant to planning criteria but they are relevant to those people who live in this area. We have been puzzled by past planning support for the development of a farm to become a substantial concrete products factory and for the commercial development at the western boundary of the Parish, despite our objections to both. At previous presentations we have attended by Mid Suffolk council we have been assured that our village would remain a village and not be swamped by Stowmarket expansion. If this proposal goes ahead we will feel like an island. We hope that you are able to ensure this proposal is not included in the Plan.

89905725 Mr Nigel MacBeth (received via email) - - - I would like to give my support to SCC’s decision not to include the proposed gravel extraction in the Gipping Valley around Creeting St Peter and surrounding areas in the counties draft mineral plan. My reasons are many but my main reason is the devastating effect any further gravel extraction would have on the archaeological sites in the area. This part of the valley is probably the last remaining example of continuous human activity spanning Prehistory through to Roman, Anglo Saxon and Medieval in the valley. If it were to go ahead then we would be removing a significant chunk of our heritage. Future generations would look upon our inability to protect these valuable and extremely vulnerable British historical sites as no better than heritage rape. Your reasons cited in your rejection say volumes. I can only repeat them again.

5.4 The Gipping Valley has been shown the be a significant focus of human activity since prehistory. The high density of known sites supports this of all periods, recorded on the County Historic Environment Record (HER).
5.5 Phase 1 (Creeting Hall) has cropmarks of pre-modern field boundaries (CRP 017, CRP 012), a trackway (CRP 016), a medieval moated site (CRP 001) and ring ditches (CRP 002, CRP 008) are visible on aerial photography. The impact on setting of several listed buildings also needs to be considered, including grade II*, Creeting Hall. The British Geological Survey records the presence of deposits, which have the potential for Palaeolithic and Mesolithic faunal, environmental, and possible artefactual remains. Deposit modelling is needed to determine the level of this potential across the site. The water-logged nature of the deposits in this position further enhances the palaeo-environmental potential of these deposits, and increases the likelihood for well-preserved organic artefacts of all periods.

5.6 Archaeological field evaluation, and deposit modelling for Palaeolithic potential, will be required at an appropriate stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be designed. Potentially significant cost implications, and high potential for the presence of heritage assets with archaeological interest of sufficient significance to require preservation in situ.

5.7 Phase 2 (Land S & W of Grove Farm) has cropmarks of premodern field boundaries and ring-ditches are visible on aerial-photography. The impact on setting of several listed buildings also needs to be considered. The British Geological Survey records the presence of deposits, which have the potential for Palaeolithic and Mesolithic Faunal, environmental, and possible artefactual remains. Deposit modelling is needed to determine the level of this potential across the site. The water-logged nature of the deposits in this position further enhances the palaeo-environmental potential of these deposits, and increases the likelihood for well-preserved organic artefacts of all periods.

5.8 Archaeological field evaluation, and deposit modelling for Palaeolithic potential, will be required at an appropriate
stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be designed. Potentially significant cost implications, and high potential for the presence of heritage assets with archaeological interest of sufficient significance to require preservation in situ.

5.9 Phase 3 (SW of Watering Farm) has a group of two large ring ditches (CRM 014, CRM 065) the ploughed down remains of Bronze-Age burial mounds, is recorded from within the site boundary, along with evidence of both Roman and Medieval occupation (CRM 028, CRM 072). Crop marks of pre-modern field boundaries, a possible Causewayed Enclosure, and Parallel ditches, are viable on aerial photography. The impact on setting of several listed buildings also needs to be considered. The British Geological Survey records the presence of deposits, which have potential for Palaeolithic and Mesolithic faunal, environmental, and possible artefactual remains. Deposit modelling is needed to determine the level of this potential across the site. The water-logged nature of the deposits in this position further enhances the palaeo-environmental potential of these deposits, and increases the likelihood for well-preserved organic artefacts of all periods. A Mesolithic bone harpoon pint (CRM 003) was found in very similar conditions 2.3km downstream. Such objects are extremely rare, both regionally and nationally.

5.10 Archaeological field evaluation, and deposit modelling for Palaeolithic potential, will be required at an appropriate stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be designed. The features identified on aerial photography represent a rare and significant group of prehistoric monuments. These should be considered of sufficient importance to probably trigger NPPF 139, therefore requiring the preservation in situ of these important archaeological remains.
5.11 Phase 4 (Land S of Hill Farm) has crop marks of two ring ditches (CRP 003, CRM 017) and a sub-rectangular enclosure (CRP 005). The impact on setting of several listed buildings also needs to be considered. The British Geological Survey records the presence of deposits, which have potential to be Palaeolithic and Faunal, environmental, and possible artefactual remains. Deposit modelling is needed to determine the level of this potential across the site. No object in Suffolk Minerals & Waste Local Plan, Grove Farm, Stowmarket, September 2017 Suffolk County Council Page 8 principle but consent will require conditions secured under NPPF for an archaeological investigation.

5.12 Phase 5 (Land N of A14) has several features of probably prehistoric date, including cropmarks of two ring ditches (CRP 003, CRM 017). The impact on the listing of several listed buildings also needs to be considered. The British Geological Survey records the presence of deposits, which have the potential for Palaeolithic faunal, environmental, and possible artefactual remains. Deposit modelling is needed to determine the level of this potential across the site. Archaeological field evaluation, and deposit modelling for Palaeolithic potential, will be required at an appropriate stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be developed.

| 90120190 | Mrs Theresa Mannell (received via email) |  | I am writing to show my support for Graham Gunby regarding Grove farm to be excluded in the minerals and waste plan. I object to a site within the parish of Creeting St Peter. There are many concerns for residents mainly the noise and dust issues that will come with this quarry, the constant damage that the HGV's will do to our small road network, the erosion and damage to the river Gipping and the fact that we have suffered floods within the area and feel this would only get worse flood issues around Flint Hall, Watering Farm and into Needham Market around Alder Carr Farm. We have footpaths which will be lost and currently are used regularly by people enjoying the landscape, this quarry proposes a new road that is | Noted. |
already set aside for a wild life area. Most importantly of all Suffolk County Council have already met the demand for sand and gravel through sites already existing, plus SCC have already rejected in their report the Grove Farm site as unsuitable.

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<tr>
<td>90437807</td>
<td>Mr Barry Risby</td>
<td>Yes</td>
<td>I support the current proposal as it is but want to mention my specific reasons for not wanting inclusion of Creeting St Mary and Creeting St Peter site as this would create pollution on many levels (noise/air/environment) and would endanger wildlife that we enjoy in this area which is a natural habitat. There is a lack of suitable transport infrastructure in place and the impact on local population would be irretrievable.</td>
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<td>90461550</td>
<td>Miss Clare Williams</td>
<td>Yes</td>
<td>None required by me.</td>
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<td>90613837</td>
<td>Mr Dominic Williams</td>
<td>Yes</td>
<td>I consider that the plan as drafted is sound.</td>
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<td>90632422</td>
<td>Cllr Wendy Marchant (received via email)</td>
<td>-</td>
<td>Dear Mr. Gunby, SUFFOLK MINERAL + WASTE LOCAL PLANT – POUNDFIELD SITE, POTENTIAL GRAVEL PIT NEAR CREETING ST PETER + CREETING ST MARY I am emailing to say that I support Suffolk’s Mineral Plan which proposes to exclude the Poundfield site of a potential gravel pit near to Creeting St. Peter + Creeting St. Mary. I am one of the District Councillor’s for Needham Market, and this site which is on the edge of Needham Market affects Needham Market at the moment. However, if the Boundary Commission’s proposals are accepted Creeting St. Peter and Creeting St. Mary will become part of the Needham Market Ward at the District Elections next year. Below is an email trail from concerned residents, which you are probably aware of already Thank you for your kind consideration. Kind regards, Wendy Mid Suffolk District Councillor Wendy Marchant – Joint Ward Member, Needham Market See representation here: <a href="https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/Individual-Reps/M/Marchant-90632422.pdf">https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/Individual-Reps/M/Marchant-90632422.pdf</a></td>
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<td>90703947</td>
<td>Mr Russell Stott</td>
<td>Yes</td>
<td>Yes</td>
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<td>I support the draft plan prepared by SCC which excludes the site at Creeting St Peter. A site in this location will cause light, noise and air pollution, badly affect a precious wildlife habitat created through hard work by many groups over many years which supports Buzzards, Owls, Otters unsuitable transport infrastructure proposed by the developer and a negative impact on neighbouring and local populations.</td>
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<td>Noted.</td>
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<td>90633158</td>
<td>Mrs Gillian Beeson</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td></td>
<td>(received via email)</td>
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<td>I support the draft plan as it is now, i.e., excluding a gravel pit near Creeting St Peter &amp; Creeting St Mary. I am particularly concerned that should this site be included, we would lose an important site of natural beauty which supports a wide range of wildlife.</td>
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<td>Noted.</td>
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<td>90820858</td>
<td>Mrs Gillian Beeson</td>
<td>Yes</td>
<td>Yes</td>
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<td>I support the draft plan as it is now, i.e., excluding a gravel pit near Creeting St Peter and Creeting St Mary. I am particularly concerned that should this site be included, we would lose an important site of natural beauty which supports a wide range of wildlife.</td>
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### Representations Received After the Deadline

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</thead>
<tbody>
<tr>
<td>90785453</td>
<td>Ms Rowena Fuller (LATE)</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>I strongly object to the inclusion of Wangford Lime Kiln in the Plan and challenge the soundness of the SCC Plan with regard to Wangford Lime Kiln. Significant details remain to be clarified so it is premature to conclude that the site could be developed within an AONB in a manner consistent with the National Planning Policy Framework. Minerals Policy GP1 is so heavily weighted in favour of the granting of planning consent to applications for sites that are included in the Plan that it is unsound to include Wangford Lime Kiln on the basis of evidence submitted to date.</td>
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</tr>
<tr>
<td>91007924</td>
<td>Mrs Elaine Roots (received via email) (LATE), Office Administrator, Hadleigh Town Council</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>Hadleigh Town Council discussed the Draft Suffolk Minerals &amp; Waste Local Plan Consultation at the meeting held on Thursday 19th July Please see the comments raised below: Hadleigh Town Council should hope that if there is an expansion of Layham Pit it would be a consultee. It was noted that ten new pits were due for expansion including one at Belstead. It was hoped that did not mean that aggregate would be brought to Hadleigh quarry for washing, bearing in mind the large equipment that has just been installed there. Concerns were raised over the recommended closure of existing land fill sites and where would land fill waste be sent to.</td>
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<tr>
<td>90927617</td>
<td>Mrs C McAllan Hunter (received via email) (LATE)</td>
<td>No</td>
<td></td>
<td></td>
<td>Submission Draft Suffolk Minerals &amp; Waste Local Plan Consultation I have recently read Suffolk County Council's report for a proposed quarry on the edge of Barnham village on the C633 and would like to object to the inclusion of the</td>
<td>-</td>
</tr>
</tbody>
</table>
proposed quarry at North Farm. As such, I would like to register the following comments regarding the legitimacy of this plan. This letter states the reasons for the objection and also attaches the “Publication Stage Representative Form” duly completed.

**Quarry**
Suffolk County Council’s response to the first stage of the consultation regarding the validity of this site as a working quarry stated that, as a result of the planning permission and the erection of the ‘Bund’, it was, officially, classified as a quarry. I believe this to be an inappropriate interpretation of the planning policy and as such the planning policy needs to be revised in order to more clearly identify the classification of a quarry. I believe that the existence of a ‘Bund’ does not constitute a quarry and therefore this is in essence to be the creation of a new quarry.

**Employment opportunities**
The livelihood of the current tenants of North Farm (three separate households) will be severely affected by the expansion of the ‘Bund’ to a quarry status. The third generation farmers have developed the land into highly productive grade 4 agricultural land. Although the report states that the working quarry will employ up to 20 people, this will only be for 6 months of the year and is therefore likely to involve the movement of employees from the contractors existing workforce rather than coming from the local workforce of which there are at present no quarrymen.

**Health and Welfare**
The village of Barnham, which has a thriving village school, a popular community centre, playground and allotments lies in the path of the prevailing wind from the proposed quarry and therefore the inevitable increase in the air pollution is of great concern. At present the area enjoys very good air quality as demonstrated by the presence of many lichens in the surrounding hedgerows which only flourish in extremely clean air. Dust particles are unavoidable in the quarrying industry and have the potential to cause increased cases of asthma and other lung related problems to vulnerable sections of the local community. Haulage vehicles at approximately 50
entering and leaving the site on a daily basis will certainly dramatically increase pollution levels

**Noise Pollution**
The necessity to use plant machinery in the extraction of the aggregates will lead to an increase in noise pollution. The constant noise of safety bleepers, low gear manoeuvres, conveyor systems, grading equipment, washing procedures and transferring the end product into the haulage vehicles will significantly impact on village life, both residents and school.

**Light Pollution, Fauna, Flora and National Heritage**
During winter work periods, for safety and insurance purposes, it will be necessary to floodlight the quarry causing light pollution which would affect a wide range of wildlife e.g. bats, owls etc.

A recent decline in the colonies of rabbits in the area (due to the presence of a strain of the viral haemorrhage disease (VHD)) will be further exacerbated by the disturbance caused by the quarrying. The rabbits are vital to the habitat because they crop headlands on which bird species, in particular the Stone Curlew and Woodlark, are dependent on for nesting. This is just one example of the potential impact on local wildlife; given that most of the areas around the quarry are designated SSSI there will be many more species that will be directly and/or indirectly affected by the quarrying. The proposed plans do not sufficiently describe the proposed steps to be taken to protect already vulnerable species from further decline due to the impact of quarrying for 30 years.

The C633 borders Thetford Heath and the site of the Gorse Estate on which the WII nuclear bomb storage development is situated, which is of unique historical importance. The entire length of verges are designated RNR reserve no.15. Criteria 1. By implementing the site for quarrying, the Council would run counter to its declaration to maintain natural grassland verges, which by its own admission have severely declined since 1945.

There are two Palaeolithic sites of international importance lying either side of the proposed quarry and through legislation PPG16 there is a need to preserve archaeological finds in situ. The proposed area has not been fully investigated for archaeological deposits necessitating an archaeologist to be on site whilst the
quarry is in operation. The proposed plans do not appear to have in place a working plan for dealing with archaeological finds during the excavation of the quarry.

**Legacy from previous activities on adjoining sites**
The plans that are attached to the planning application appear to be outdated and may be misleading. Within the existing presentation neither Suffolk County Council nor Mick George Ltd have cited the potential presence of mustard gas which is surprising given the significant risks that mustard gas raises if it gets into the water table. Little Heath, which borders the length of Site 4 was the dumping site of a great deal of waste matter from the original designated mustard gas site. There are several spoil mounds in existence which are easily visible and which lie above the proposed quarrying area. There is, therefore, the potential for leaching of dormant toxic chemicals to occur due to disturbance to the water table caused by quarrying. Given the historical military usage of the areas around the proposed quarry, and the fact that it can not be irrefutably proven that mustard gas deposits and other chemicals such as mercury from WWI and WWII in the area have been safely disposed of in the past or that seepage into the water table or air born toxins released through quarrying will not occur, there must be a need to carry out borehole investigations to assess and quantify the chemical toxicity of the area and the impact this will have if it leaches into the air or water table due to inadequately disposed of chemicals.

What leverage has been employed to force the MOD to release documents regarding the above to determine toxicities risk ?

**Overall summary**
The report lacks sufficiently robust commitment to demonstrate avoidance of a detrimental nature to the local communities and habitats, flora and fauna with regard to increased noise and pollution that the operation of a fully working quarry will inevitably bring to the surrounding area. The report continually states that the required impact assessments either “have” or “will” be carried out in future in areas such as air pollution, noise pollution and the environmental impact, that necessary mitigation will be put in place to protect to ensure negative impact in these areas will be minimised. Whether it will indeed be
adequate is not documented within the report. To suggest earth banks and tree belts (which will not even be at maturity) are a risible and paltry gesture.

In conclusion, the concerns I have mentioned leave me in no doubt that Suffolk County Council should dismiss the application to exploit the proposed quarry site at Barnham - not only now, but also to block any future development proposals of this type, especially as a critical look at other sites suggests that potential sites of low to no population impact are available.

Mrs Andrea Russell (received via email) (LATE)

Yes No No

The Environment Agency, Suffolk County Council have both acknowledged there is a potential increased flood risk and the area is a ground water source protection zone. This was considered significant enough to reduce the size proposed site. The Duty to co operate as I understand gives the Council powers where there is acknowledged risk instruct applicants to commission investigations rather than wait for planning application. Therefore I suggest that is is unsound and that all parties have failed to demonstrate the duty to co operate.

The ground water requires a complex, seasonal assessment to give reliable data as to the long term flood risk taking into account climate and the complex geology of breckland environments. The planning application needs to include independently commissioned assessment and projection throughout the proposed extraction period, as part of The Flood Risk Assessment, within this there needs expert opinion on the risk of contamination from mustard gas wastes which could be within the proposed area.

There needs to be strategies in place to reduce not only the actual risk but also the management of perceived risk, which could be problematic in local populations who will need reassurance that the flood risk and possible contamination have been given the highest consideration at the planning stage. The acknowledged flood risk is the factor which sets this site apart from others in the current plan and therefore must be given very detailed and expert opinion by the applicant, the council over and above that on other applications.
<table>
<thead>
<tr>
<th>Reference</th>
<th>Name and Address</th>
<th>Additional 1</th>
<th>Additional 2</th>
<th>Response 1</th>
<th>Response 2</th>
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<tr>
<td>91347894</td>
<td>Mrs Wendy Compson (received via post) (LATE)</td>
<td>No</td>
<td>No</td>
<td>Traffic through Tuddenham and Cavenham is impossible already without an additional 80 movements per day. (an 80% increase is planned). Air quality will be massively affected. Quality of life for local residents will reduce dramatically. A road should be constructed to join the Cavenham road site exit, round the sewage works, and on to the Higham road &amp; the A14.</td>
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</tr>
<tr>
<td>91349352</td>
<td>Mr Chris Compson (received via post) (LATE)</td>
<td>No</td>
<td>No</td>
<td>Traffic through Tuddenham and Cavenham is impossible already without an additional 80 movements per day (80% increase is planned). Air quality will be massively affected. Quality of life for local residents will reduce dramatically. A road should be constructed to join the cavenham road site exit past the sewage works, and on to the Higham road &amp; the A14.</td>
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<tr>
<td>90927600</td>
<td>Peta Jessemey (received via email) (LATE)</td>
<td>-</td>
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<td>Point 13 Tattingstone. 13.7 Highways. If the current road set up is adequate, why are vehicles still using the direct A137 access even in the early hours of the morning when they should be using the Station Road access? I regularly see the site vehicles passing through and exceeding the 30mph limit. 13.15 Air Quality I have witnessed a number of fires that have broken out on the site in the past year. I am very concerned that the deliberate burning of waste or backfill is taking place. The smell is often one of burning plastic. I have been told by employees that a woodchipper on the site regularly catches fire because the safety guard has been removed to allow more wood to be processed in one go. I have attached footage of the most recent fire. The prevailing wind carries any smoke in the direction of my home. I do not believe any restrictions placed upon the site will be adhered to if they interfere with opportunities for the business as they have regularly flouted curfew and lorry access rules to suit themselves. They have recently doubled the height of the mounds surrounding the site, cutting out light from neighbouring properties.</td>
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27. **Consultation statistics**

The table below shows a breakdown of comments.

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<th>Comment</th>
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Please note that some of the proposed changes below are related to representations listed under “other” rather than the precise subject matter particularly if there is a long list of minor matters.

<table>
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<tr>
<th>Subject</th>
<th>Proposed changes</th>
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<tr>
<td>2. Executive summary</td>
<td>Typographical error will be corrected.</td>
</tr>
<tr>
<td>3. Introduction</td>
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<tr>
<td>4. Vision, Aims, Objectives</td>
<td>Reference to “landscape character” added to the Vision and Objective 5.</td>
</tr>
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<td>Add reference to “avoid” to Aim 2.</td>
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<td>Add reference to “visual impact” to Objective 7.</td>
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<td></td>
<td>Delete additional first “other development” in Aim 3.</td>
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<tr>
<td></td>
<td>Page 9 Aim 3 delete additional first “other development” in Aim 3.</td>
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<td>Policy GP1</td>
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<tr>
<td>Policy GP3</td>
<td>Typographical error will be corrected.</td>
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<tr>
<td>Policy GP4</td>
<td>Add reference to “setting” to part “C”.</td>
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<tr>
<td>Policy</td>
<td>Notes</td>
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<tr>
<td><strong>SMWL</strong></td>
<td>Typographical error will be corrected.</td>
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<td></td>
<td>Page 14 paragraph 4.13 .substitute “where” for “were”.</td>
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<td></td>
<td>Page 16 Policy GP4 delete “access and”.</td>
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<td></td>
<td>Amend Policy GP4 by adding an additional clause “military and civil aviation”.</td>
</tr>
<tr>
<td><strong>Policy MP1</strong></td>
<td>Page 19 paragraph 5.11 remove “at”.</td>
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<tr>
<td></td>
<td>Page 20 paragraph 5.19 remove “the”.</td>
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<td><strong>Policy MP8</strong></td>
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<tr>
<td><strong>Policy MP9</strong></td>
<td>Remove the words “potentially conflicting”.</td>
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<tr>
<td></td>
<td>Correct paragraph 5.43 to read “The East Inshore and East Offshore Marine Plan and The South East Marine Plan”.</td>
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<tr>
<td></td>
<td>Add an additional link to the The South East Marine Plan.</td>
</tr>
<tr>
<td><strong>Policy MP10</strong></td>
<td>Part a. Remove the words “which is not in accordance with the Development Plan” and add the words “or used within the development” to the end of the last sentence.</td>
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<td></td>
<td>Additional wording: “Any mitigation required falls on the development that receives planning permission last.”</td>
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<td>Change the reference in the last paragraph from “MSA” to “MCA.”</td>
</tr>
<tr>
<td><strong>Policy WP1</strong></td>
<td>Page 29 paragraph 6.4 remove “of”.</td>
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<tr>
<td><strong>Policy WP2</strong></td>
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<tr>
<td><strong>Policy WP3</strong></td>
<td>Amend e) to read “agricultural and forestry land (open air composting only) excluding ancient woodland or planted ancient woodland sites.”</td>
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<td><strong>Policy WP4</strong></td>
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<td><strong>Policy WP7</strong></td>
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<tr>
<td><strong>Policy WP8</strong></td>
<td>Add reference to B2 and B8 use classes.</td>
</tr>
<tr>
<td>Policy WP9</td>
<td>Page 35 paragraph 6.16 replace “of” with “and”.</td>
</tr>
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<tr>
<td>Policy WP10</td>
<td>Page 36, paragraph 6.24 replace “effected” with “effect” and replace “than” with “then” and “of” with “or”.</td>
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<td>Policy WP11</td>
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<td>Policy WP12</td>
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<td>Policy WP13</td>
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<tr>
<td>Policy WP14</td>
<td>Amend wording as follows:</td>
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<td>“Proposals relating to the role, function and operation of water recycling centres including the provision of additional sewage treatment capacity and supporting infrastructure (including renewable energy) will be supported in principle particularly where it is required to meet the wider growth proposals identified in the Development Plan.</td>
</tr>
<tr>
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<td>New or extended water recycling centres will be supported where such proposals aim to improve the quality of discharged water or reduce the environmental impact of operation. The developer will be required to demonstrate that the proposal does not give rise to unacceptable environmental impacts.</td>
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<td></td>
<td>Proposals must also comply with the environmental criteria set out in Policy GP4.”</td>
</tr>
<tr>
<td></td>
<td>It is also noted that Anglian Water prefers the term “Water Recycling Centres” to Waste Water Treatment Facilities” and references shall be changed throughout the Plan.</td>
</tr>
<tr>
<td>Policy WP15</td>
<td>-</td>
</tr>
<tr>
<td>Policy WP16</td>
<td>Add additional explanatory text “The Energy Act (2004) requires the Nuclear Decommissioning Authority (NDA) to review and publish its strategy every 5 years. The can be viewed on the NDA website by following the link provided below:</td>
</tr>
<tr>
<td>Policy WP17</td>
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</tr>
</tbody>
</table>
| Policy WP18    | WP18 first paragraph reword to say “use of such”.

Barham

Modify Paragraph 8.7 to include reference to the Sandy Lane access to Norwich Road as well as the quarry access to Sandy Lane.

Add clause i) to Policy MS1: Barham “the potential impact upon the Grade I listed medieval church of St Mary.”
<table>
<thead>
<tr>
<th>Location</th>
<th>Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barnham</td>
<td>Add an additional clause to Policy MS2 Barnham: “q) a traffic management plan drafted to avoid traffic routing through local villages including Barnham except in the case of local deliveries.” Add clause q) to Policy MS2: Barnham – “the potential impact upon Barnham Atomic Bomb Store Scheduled Monument and listed buildings.”</td>
</tr>
<tr>
<td>Belstead</td>
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<td>Cavenham</td>
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<td>Layham</td>
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<td>Tattingstone</td>
<td>Modify clause d) of Policy MS6 to read “potential impacts upon nature conservation interest including trees, ditches, watercourses, the Stour &amp; Orwell Special Protection Area, European Protected Species (Bats), Priority Species, Priority Habitats, which need to be adequately assessed and where necessary mitigation proposed;”</td>
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<tr>
<td>Wangford</td>
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<tr>
<td>Wetherden</td>
<td>Add an additional clause to Policy MS8 Wetherden: “j) a traffic management plan drafted to avoid traffic routing through local villages including Elmswell and Wetherden except in the case of local deliveries.”</td>
</tr>
<tr>
<td>Wherstead</td>
<td>Move reference to the “Ground Water Source Protection Zone” from part &quot;c&quot; of the policy to part &quot;g&quot; of Policy MS9.</td>
</tr>
<tr>
<td>Worlington</td>
<td>Move reference to the “Ground Water Source Protection Zone” from part &quot;c&quot; of the policy to part &quot;e&quot; of Policy MS10.</td>
</tr>
<tr>
<td>Sizewell</td>
<td>Amend wording of Policy WS1 to read: b) likely adverse effects (either individually or in combination with other developments) on the notified special interest features of Sizewell Marshes SSSI, Leiston-Aldeburgh SSSI, Sandlings SPA, Minsmere-Walberswick Heaths &amp; Marshes SSSI, Minsmere-Walberswick SPA/Ramsar, Minsmere to Walberswick Heaths &amp; Marshes SAC, ..., etc. c) Detailed assessment of the impacts on the special qualities of Suffolk Coast &amp; Heaths AONB and on Suffolk Heritage Coast; mitigation of identified landscape and visual impacts and reinstatement which is in keeping with local landscape character.</td>
</tr>
<tr>
<td>Appendix 1</td>
<td>Amend Glossary to make reference to: “Scheduled Monument”. Add reference to other historic environment terms that are mentioned elsewhere in the Plan.</td>
</tr>
<tr>
<td>Appendix 2</td>
<td>Amend monitoring framework under Policy WP1 to include “significant changes to patterns of waste management”.</td>
</tr>
<tr>
<td>Appendix 3</td>
<td>Delete reference to Gowing Autospares. Add County County boundary.</td>
</tr>
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<td></td>
<td>Amend paragraph 22.1 to read WP18 not WP17.</td>
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<td>-----------------------------</td>
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<tr>
<td>Proposals Map</td>
<td>-</td>
</tr>
<tr>
<td>Sustainability Appraisal</td>
<td>Include list of Broads Authority documents in SA.</td>
</tr>
<tr>
<td>Habitats Regulation Assessment</td>
<td>SCC has revised the appropriate assessment and undertaken an additional focussed consultation.</td>
</tr>
<tr>
<td>Evidence base</td>
<td>-</td>
</tr>
<tr>
<td>Other</td>
<td>Remove the unnecessary comma from the first line of each site specific policy.</td>
</tr>
<tr>
<td>Stowmarket rejected site</td>
<td>-</td>
</tr>
<tr>
<td>Late representations</td>
<td>-</td>
</tr>
</tbody>
</table>